



All responses received to the Pre-Publication Draft Local Plan (Regulation 18)
https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/draft_local_plan/draft_local_plan_pre_publication_version
Consultation from 10 December 2021 until 31 January 2022

Published by LBRuT May 2022

Please note, the responses below are exactly as received from the respondents and have not been edited by the Council.
They are not alphabetically ordered or in any other order of priority.
Comments have been moved/grouped so that common points are viewed together.
The format follows the questions set out on the [response form](#) in Tables 1 to 5 and the following general comments in Table 6 are in Plan order.
The schedule shows where any personal information within responses relating to contact details, particularly full address data, has been removed stating e.g. *[personal details removed for data protection]* or shown as black rectangles in the appendices.
Appendices have been made available separately where due to the length or nature of responses they could not be captured within the main Schedule. The officer references added are shown in the Schedule as *[See Appendix....]*
A full consultation report including summaries of issues raised and responses to the comments raised, and a report of the virtual events, are due to be published separately later in 2022. A separate report will also include discussions with relevant Duty to Cooperate bodies.

Table 1: All responses received (to question 4 on the [response form](#)) in relation to the strategic vision (section 3 of the draft Plan) (as received) and the Council's officer response
(note general comments in relation to the strategic vision are also set out in Table 6 below)

Name	Comment
Caroline Wren	I don't disagree with anything in this section but I think it's missing some important ingredients / is a bit too light in some important areas; <ul style="list-style-type: none">• shouldn't we see something about supporting sustainable energy sources such as solar panels, or is that not in scope for this type of doc because there are limitations imposed at national level on what can be pushed through in a conservation area?• I'm quite concerned about flooding and read that a lot of the borough is 'Critical Drainage Area'; by 2024 there are commitments to have new Sustainable Drainage Systems in place across the borough, according to the Climate Change Emergency Strategy - should that have been referenced? for example better drainage for schools and other public facilities.
Robert Blakebrough	Generally reasonable and not controversial
Gary Backler, Friends of the River Crane Environment (FORCE)	This response to the London Borough of Richmond upon Thames Local Plan Pre-Publication Regulation 18 Consultation has been prepared by Friends of the River Crane Environment. FORCE is a registered charity, set up in 2003 and with nearly 800 members, most of whom reside in LBRuT. More information on FORCE can be found at www.force.org.uk The Objects of the Charity are to protect and enhance the corridors of the River Crane and Duke of Northumberland's River for the benefit of wildlife and local people. This response is prepared in relation to these Objects, and we comment on the Consultation draft only insofar as its draft policies pertain to our Objects. We believe that we have a constructive relationship with relevant LBRuT officers, and we value this relationship. It has enabled a positive track record of delivery of benefits for the Crane valley. We look forward to continued engagement with LBRuT in the development and implementation of its Local Plan. At a strategic level, we recognise that the climate emergency and growing population are identified as reasons why a new Local Plan is needed (2.10). We welcome the parity given by the Council in the Local Plan to addressing the climate emergency and accommodating population and business growth. We trust that in its development and implementation, the Local Plan will continue to respond to emerging population levels, taking account of Brexit-related and post-pandemic population shifts. We trust that it will continue to respond also to the changing age profile and work-location preference of residents, both of which impel towards increased demand for accessible open spaces connected by safe and intuitive pathways, and may mitigate the pressure to provide new office space.
Jon Rowles	The document has become difficult to comprehend. Maybe the area plans and site allocations need to go to the end. It does not appear 'positively prepared' and I get the impression that LBRuT is trying to push growth onto neighbouring boroughs and the countryside. For instance, conservation areas are not off-limits for new development and they often contain buildings which if replaced could enhance the area. I do not believe that assertion that at the end of the plan period everything a resident needs 'can now be reached within 20 minutes by foot or bike' - some needs may be met this way but not 100% and the plan doesn't have enough detail on how it's going to increase capacity for longer essential journeys that will still need to be made in the context of huge growth taking place in Kingston and Hounslow (both London Plan Opportunity Areas) and the home counties. When you go through the plan it is clear that the policies will never get near delivering this and it makes the plan unsound. Twenty-minute neighbourhoods may be the current "buzz word" in planning circles but Richmond appears to have misunderstood what the 'twenty minutes' refer to. The generally accepted definition is ten minutes to the destination and ten minutes back home (twenty mins in total). This local plan is trying to say that people would be willing to walk a round trip of forty minutes, which is just not going to happen. The council seems to have mixed up the 20-minute neighbourhoods with 15-minute cities which have 15 minute-one way journeys by foot or cycle (and thus significantly less compact) and is more of the traditional 'town-centre-first' policy and doesn't include the need for most people's workplaces to be in the same neighbourhood. Therefore, the plan needs to define better what it trying to achieve; 20-minute neighbourhoods or 15 minutes cities as there are significant differences. Any ambiguities will be fully exploited by developers and their expensive planning barristers. Statements like 'local hubs provide space to work, rather than workers commuting daily out of the borough' already look out of date - and show a lack of understanding of the local labour market. Most employers are now requiring workers to return to the office - and the majority of economically active people in Richmond do not have jobs that can be easily undertaken at home. The local plan is not addressing their needs and appears to be saying that it will be a 'good thing' if their journey to work is taking longer and is more uncomfortable. If you look at the alternative Travel to Work Areas website you can see that people with fewer qualifications are having to work increasingly further distances to work. Therefore, if the council is serious about reducing the need to travel it needs to improve adult education and training opportunities and set up more adult education hubs across the borough. The borough is an important part of London, the capital city of the UK - but the plan is very 'lite' on how it aims to support London's role as the centre of the UK economy. One of the easiest ways to reduce traffic would be to increase the number of school places so that children can go to a school close to their home. Another is to have more food shops (such as Tesco Express or Sainsbury's Locals) close to peoples homes. We used to have twenty-minute neighbourhoods in the 1950s and they give us a very good blueprint on what facilities are needed. Unfortunately, this plan concentrates on town centres rather than identifying areas that lack services and plugging these gaps. The plan also suggests there should be large scale investment in the cultural offerings in the well to do Twickenham and Richmond centres - where there is already good provision, but then offers very little for the less wealthy areas that have none and just suggests that one-off events can be held in parks or high streets. I can see why the Town & Country Planning Association warns of the risks of gentrification and that left behind areas can be further disadvantaged by the reduced mobility that poorly implemented 20-minute neighbourhoods can cause.
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	RBGK is generally supportive of the overarching strategic vision, including the response to the climate emergency, retaining and improving biodiversity, and protecting heritage and culture.
Tom Dunbar	I see an opportunity to allow smaller businesses to thrive nearer Twickenham Green. in particular, local amenities (E.g. gyms) and shops / cafes - especially as more and more people are now working from home. Such amenities should evolve to meet the growing population in this area - particularly with the new Greggs site potentially bringing in more households.

Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	Whilst the thrust of the Vision is supported the emphasis on localism should not be allowed to become resistance to the encouragement of inward investment and the attraction of people and resources from outside the Borough, for example hotel schemes which support the local economy and community by attracting and retaining visitors and their spending power.
Louise Fluker, The Richmond Society	The vision is a challenging one. Without specific targets which are measurable it might be meaningless
Siriol Davies, Ham and Petersham Neighbourhood Forum	<p>The 20- minute neighbourhood concept and strategic vision is complementary to the Ham and Petersham Neighbourhood Plan (HPNP) vision copied below. We recognise that HPNP was developed in conformity with the current Local Plan and previous iteration of the London Plan and does not reflect the council's declaration of Climate Emergency or the impact of the pandemic.</p> <p>HPNP Vision</p> <p>To build on the identity of Ham and Petersham as a distinct and sustainable mixed community giving great opportunities to live and work within a semi–rural historic landscape.</p> <p>Our vision for a sustainable community is that, whenever viable, residents will have access to education, shopping, working, cultural and other opportunities within Ham and Petersham so as to foster a greater sense of belonging and identity. We will encourage an increasing proportion of local journeys to be by foot or bicycle by creating a network of cycle/walking routes accessible to a range of ages and good public transport.</p> <p>Local services, activities and opportunities will be complemented by convenient and efficient access to Kingston, Richmond, Twickenham and further afield including central London. Walking, cycling and public transport will be attractive and viable for these journeys also.</p> <p>From our consultation, the range of social groups living in the area emerged as a distinctive and valued characteristic and this has led to the aspiration to continue to encourage a mixed community of different ages and social groups. The description of the neighbourhood area as ‘semi- rural’ has been used to describe the setting of the settlements of Ham and Petersham within substantial areas of open and undeveloped land. This is also a distinctive and valued feature of our area, providing relative isolation from more urban areas of London.</p> <p>20-minute Neighbourhood concept</p> <p>We are supportive of the 20 minute Neighbourhood concept and the idea of living locally with access to local shops, schools, and social spaces and workplaces within an easy 20-minute walk or cycle journey; nurturing local facilities and connectedness to strengthen communities and improve the quality of life, by reducing the anxiety and time spent travelling, and providing more time to spend with family and friends. And decreasing car journeys to improve air quality, and create liveable cities, and increase active journeys to improve physical and mental health and wellbeing.</p> <p>Inclusiveness and equality</p> <p>As a concept, the provision of local services is inclusive of those who are less able to travel through wealth or health inequality and for younger people and children who are less able to travel independently. For communities who have experienced isolation through lockdowns and shielding, the importance of sustaining relationships and value of social interaction and activity for mental and physical health, has been brought into focus and is addressed through this concept.</p> <p>Economy</p> <p>As the pandemic has exacerbated a rise in internet shopping, the 20-minute Neighbourhood is a means to support local and independent shops and services and provide a strategy for recovery.</p> <p>Heritage and Design</p> <p>The plan notes that today’s London was formed from the expansion of villages which joined to form the metropolitan area. This concept seeks to re-establish the character and identity of neighbourhoods within the metropolitan area.</p> <p>Climate Emergency</p> <p>The draft Local Plan and 20-minute Neighbourhood strategy responds to Richmond Council’s declaration of Climate Emergency and commitment to net-zero by 2050, through reducing need to travel and improving the choices for sustainable and active modes, improving the environment and biodiversity and promoting net-zero development.</p>
Mr & Mrs Metcalf	We are concerned that the climate objective rings hollow when, first, policies allow a weaker approach to flood risk for an extension than a new development/ redevelopment, especially when the former includes the demolition of a house but for a token piece of wall (or, if the developer can manage it, even that can be demolished in the course of the works on safety grounds); second, if the Borough's officers do not enforce the policies, eg accepting FRAs that consultees point out as flawed as to facts and completeness of content. We have personal experience of that.
Simon Tompsett, Richmond & Twickenham Friends of the Earth	We welcome the emphasis on avoiding climate change and protecting biodiversity.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.
Benjamin John	Provision for existing waste disposal to be improved and recycling of plastic waste especially should be included as a top priority.
Carolyn Doughty	I think it is very important to provide community services and minimise over development of residential properties
Lynne Bailey	concern when you mention 20 minute neighbourhoods is that you do not always tie it in with public transport and the need for good public transport to reach those amenities. Many people who prefer to avoid car use do not cycle and would struggle badly to walk for 20 minutes therefore leaving public transport as the only option. I did not feel this section gave enough consideration to the elderly and disabled. I also felt Section 4 had the same issue.
Clare Snowdon	I would like to see the borough be even more bold, visionary and courageous in the vision for biodiversity, climate and human welfare - perhaps through training and collaboration e.g. with https://climateimagination.org/
Paul Luton, Cycling UK	Fully support this vision
Lynda Hance	<p>It's out of date already: 2 We are in year 2 of the pandemic and I can see no acknowledgement of how this has impacted the people of the borough or any consideration to what they will need in the future. I am particularly thinking of larger homes with more space to work from home, & improved broadband connectivity.</p> <p>[See comment in relation to Kneller Hall and comment in relation to Whitton/Heathfield]</p>
James Armstrong, Richmond Cycling Campaign	<p>RCC strongly agrees with the Strategic Vision. The framing of the Local Plan within the 20 Minute Neighbourhood concept is a remarkably progressive, and to the benefit of all residents. A borough where Active Travel is the easiest choice, with reduced dominance of vehicles and benefiting from a Healthy Streets approach is one that is healthier, happier, and wealthier.</p> <p>We hope Richmond Council is bold enough to deliver the policies that will make this vision possible.</p>
Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	<p>The Strategic Vision states that "office space in our main centres has adapted and local hubs provide space to work, rather than works community daily out the the borough".</p> <p>We would comment that Richmond is a key SW London Office Market and is proving particularly attractive for the Technology, Media and Telecomms sector.</p> <p>There has been a recent large influx of available newly refurbished office space. Older office stock is not as able to adapt to the changing post pandemic requirements particularly in the face of the large amount of newly refurbished stock.</p> <p>As a result, the strategic vision to secure the best for the borough needs to recognise the disparity between viable and unviable office space. The release of unviable office space will not harm the strategic vision of increasing jobs and helping business to grow and bounce back following the pandemic.</p>

Jim Brockbank	I especially agree with Policy 1 the 20 minute neighbourhood, Policy 11 Affordable Housing, Policy 49 Social and Community Infrastructure, and Policy 51 Health and Well-being These policies are especially relevant in the context of the borough being an attractive locality for families, as acknowledged in the local plan.
Michael Cross	The principle of the 20 minute community is a very sound one for the social, economic and environmental development of Richmond
Matthew Bolton	I strongly agree with the strategic vision, particularly around the spatial plan to cater for 20-minute neighbourhoods. This is vital as we learn the lessons from the pandemic and the importance of the local community, health and wellbeing. By promoting localism, there will be better opportunities to walk and cycle for daily needs and reduce car dependency within the area which has numerous disbenefits for the driver and the wider community. I strongly support the need to reduce the need to travel and improving the choices for more sustainable travel. As a borough with high car ownership, it will always be difficult to tempt drivers out their cars. In many cases they have paid a lot of money for their car, which they consider as a status symbol and therefore wish to drive it, irrespective of whether it is the most appropriate mode. However, by promoting sustainable modes and reducing the attractiveness of driving, such as the councils free 30 minutes car parking, the council can make a meaningful change to the way its residents behave day to day.
Mark Lawson	I support any genuine improvement to the borough that increase or maintain it as a desirable borough to live in. This is clearly an important document which I would have appreciated more time to consider prior to the deadline for one of my local buildings in Teddington.
Alison Parkes	I agree that any plans for Teddington should reflect the strong sense of community already within the area. Emphasis should be on promoting local businesses and initiatives rather than national chains. We also need to do more to make our green spaces - like the misnamed Udney playing fields - publicly available. With regard to residential developments, we do need truly affordable housing within the borough. And housing that reflects the needs of families - ie not more blocks of flats. Perhaps the council should take direct landlord responsibility rather than relying on developers - who have other imperatives - to provide 'affordable' dwellings as part of a broader commercial package.
Alison Campbell	More social housing for affordable rent needed.
Ursula Armstrong	There should be an option to agree with some objections and disagree with other objectives/strategic visions [See comment on Site Allocation 9: Teddington Police Station, Park Road, Teddington]
Sue Clayton Smith	The vision to encourage reponse to climate emergency is critical. I think this can be assisted by increasing urban greening and protecting what valuable green space there already is in the borough. The plan for new homes is important, however it should be borne in mind that in some parts of the borough housing density is already high and the addition of new homes in these areas with the additional traffic and pressure on local services this will bring needs to be fully taken into account. The variety of shops and uses should be increased and encouraged there are too many of the same type of outlet in Twickenham town centre for example, cafes, barbers etc.
N Maureen John	Agree with general ideas. Specific to Teddington: To combine the old Police Station in Teddington with housing and use as a medical centre thus relocating Park Road Surgery would be good a use of the existing site.
Christine Palmer	Affordable housing needs a far higher presence and priority
David Marlow	P14 - P24. Ok. BUT it is a pity Council largely ignores its own Vision + strategic objectives e.g. See Twickenham Riverside Planning Application ref 21/2758. Project will generate tons (undisclosed) of CO2. Delivers new homes but on Diamond Jubilee Gardens held in Trust for public enjoyment - reprovision is clearly inferior.
Christine Duke	Agree for the most part, with reservations. Am concerned that the more positive aspects of this strategic vision will not be experienced fairly and equally across the Borough; And do not consider additional high rise buildings to be of benefit anywhere within the Borough. Also, am concerned that certain areas idealistically proposed for development and infill could end up becoming overcrowded, crammed and cluttered with a mish mash of concrete buildings and deprivation of various and numerous kinds, especially at the centre and on the outskirts of our lovely Borough. I think it is fair to say that most of Richmond Borough residents would want to live in family friendly towns / village areas and healthy streets. Also regarding the vision of local residents needs being reached within a twenty minute walk or cycle ride. It needs to be borne in mind that not everyone can cover the same distance within 20 minutes and the condition of both pavements and roads need to be improved dramatically, and kept safe to use.
Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	The strategic vision states that from adoption of the Plan in 2024 (by 2039) growth will have been accomodated across the borough, making use of the borough's much valued assets. The RFU support this ambition and the creation of adaptable and vibrant places through new development. The vision references the outcome of the 'living locally' concept: by 2039 everything a local resident needs can be reached within 20 minutes by foot or bike. The RFU support the living locally approach for access to essential services to fulfil daily needs. However, the vision and the corresponding policy (Policy 1) as currently drafted applies to 'all development, except householder applications', and needs to clarify exclusions for Twickenham Stadium as an nationally significant sporting and entertainment venue. This is further considered in the attached detailed response letter. The vision includes the borough's sustained and enhanced strong arts and cultural offer, and its role in post-pandemic recovery, providing a destination and reason to visit, locally, from across the wider region and beyond. The Twickenham Stadium and complementary uses included within its site allocation will be key to attract visitors and the associated local spend essential to post-pandemic recovery This is further discussed in the attached detailed response letter. [See comment in respect of Site Allocation 13. Twickenham Stadium]
Mary Egan	The vision to encourage much more response to climate emergency is a high priority. This can be achieved by increasing urban greening and protecting species and habitats thus tackling the biodiversity loss. Wildlife and dark corridors along the borough rivers should be promoted especially after the pandemic when we realised just how important they are. Delivering new homes is good, but some of our communities are overcrowded with dense housing and resultant traffic stress. The variety of shops should be increased, most new openings are related to food - cafes, grocery.
James Bartholomeusz	It is good to see a plan to help combat the climate emergency via local action, including maximising the positive environmental impact of the borough's green spaces. This will be the single most important aspect of any policy, local or national, in the coming years.
William Mortimer	Although keen to see redevelopments in the riverside area comprised of Mortlake and Barnes, it is difficult to agree that proper consultation is resulting in the appropriate detail of the proposed schemes, particularly for the Brewery Site. This stretch of the Thames is where J M W Turner learned to paint the river-scape with its mists and surface conditions in a variety of lights. His paintings show the amount of craft on the river plying trade and ferrying people. Historically, the tall chimneys at the brewery site were approved in very recent history. The plan for restoring a village centre for Mortlake, which was gutted when the dual carriageway element of the A3003 was pushed through in the 1960s. A change in the designation of land use from industrial to a mixture of residential and commercial building must therefore consider the character of the adjacent residential areas and the historic importance dating before the huge population growth from the time of Tudor and Stuart monarchies. Since the arrival of the railways this area has supported the verdant riverside towpath and Commons that today provide the recreational lungs of our communities. The Mortlake Community Group reflects a desire to develop the brewery site but has not enjoyed the support of the Council to date in its pursuit of solutions that match the needs of the community and the service infrastructure that is available to support them. I have responded to the Developer's Zoom event on 26th January 2022 and my principle concerns are repeated later.
David Abel	I agree with the idea of trying to provide services within a twenty minute walk but do not agree that we need to intensify the density of housing. Affordable housing to ensure that the borough is a mix of people and occupations should be the strategy not just to increase housing provision. The desire to tackle biodiversity loss and improving green spaces is an excellent idea but I can't see how that is going to be achieved by building over and astroturfing existing green spaces.
Alice Shackleton, on behalf of The Kew Society	In principle The Kew Society is supportive of this vision. We discuss some aspects and concerns below under relevant policies, as we do have concerns about potential lack of inclusivity of older people (there is noted the increasing proportion of ageing people), those less able and those with young children in the emphasis on cycling an walking or other people who are less mobile and who may need motor vehicle transport.
Jon Burrell	Key points of strategic vision are good but would expect a focus on public transport in addition to active travel. More focus should be made on air quality and reducing noise pollution.
Bridget Fox, on behalf of the Woodland Trust	We support the vision of protecting, enhancing and extending biodiversity and natural green infrastructure within the Borough.

Joanna Childs	Climate change initiatives need to be accelerated or much of the borough will be under water by 2039. Does your use of terms such as “compacted”, “intensification” and “infill” mean you aspire to cram as much housing into the area as possible, so that everyones quality of life deteriorates? Has the biological leakage of the ageing population been factored in? In 2013 13.6% of the population were over 65 so will be over 91 by 2039 and it is likely that many may have died.
Vivien Harris, Friends of Richmond Green	The Friends of Richmond Green (FoRG) is an amenity action group. Our key aims and objectives are: <ul style="list-style-type: none">• to promote public interest and civic pride in Richmond Green and vicinity• to improve the quality of life and long-term attractiveness for residents• to improve the character and quality of the built and natural environments• to improve the cleanliness and appearance of the streets and public spaces• to contain traffic while recognising the parking needs of residents and visitors• to encourage responsible use of The Green and surrounding area FoRG as an amenity group is over 50 years old and is run by an executive committee based on a formal constitution. The Friends of Richmond Green fully endorse and support the response by Prospect of Richmond to the new draft Local Plan. We have read the response and have been engaged with the respondents on the content. For clarification, the response is a Prospect of Richmond response with Friends of Richmond Green support and endorsement.
Alec Lever, Richmond Labour Party	Congratulations are due to all whose diligent work produced this plan. Its Strategic vision and objectives are endorsed by Richmond Labour Party.
Vicky Phillips, Habitats & Heritage	Habitats & Heritage (www.habitatsandheritage.org.uk) is a local charity based in Twickenham that acts for the natural and historic environment and climate of South and West London. We act as the Chair and Secretariat of the Richmond Biodiversity Partnership which produces the Richmond Biodiversity Action Plan. We also work on projects which seek to tackle climate change, including the energy efficiency project South West London Energy Advice Partnership (www.swleap.org.uk), and involve the community in parks and open spaces. We are pleased with the overall shape of the plan and its emphasis on action to tackle the climate emergency, protect and increase biodiversity and protect local heritage. The concept of living locally and the 20-minute neighbourhood is also very much part of the vision of our charity which seeks to connect people to the places where they live and work.
Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.
	Note comments on site-specific allocations (including in relation to Site Allocation 9: Teddington Police Station) have generally been collated in Table 6 below.

Table 2: All responses received (to question 5 on the [response form](#)) in relation to the strategic objectives (section 3 of the draft Plan) (as received) and the Council’s officer response (note general comments in relation to the strategic objectives are also set out in Table 6 below)

Name	Comment
Caroline Wren	There were a few details I thought were lacking / too light: <ul style="list-style-type: none">• if one of the aims is to make this borough 'affordable for all', shouldn't there be more reference to that? or is a few nods to affordable housing and the 20 min neighbourhood the only in-scope initiatives for this type of doc? I felt like we should see harder targets for pricing on new homes, potentially commitments on rents too.• I would have preferred to see a mention of VisionZero for reducing Killed & Seriously Injured on the transport network• obligations around sites important for nature conservation (SINC) include preventing adverse effects from air/water/noise pollution; as such, couldn't we aim for more to be done to improve pollution around those sites?• from the Climate Change Emergency strategy there's some commitments to details like installing drinking water fountains and creating rain gardens, blue/green roofs, etc - i didn't see mention to that type of initiative specifically in the Local Plan, although I think those ideas were being hinted at; could we be more specific so that the plan will be more measurable and actionable?
Myrna Jelman	I support urgent urban greening as well as mitigating strategies for surface flooding in the borough. There is no sense of crisis from the local plan yet in my view and yet flooding is coming to London, as we already know.
Jon Rowles	There are ten strategies - with a subset of policies under each one. They are too long, difficult to comprehend and are confusing which will result in few people being to understand what the key strategies actually are. It looks like the council have copied out the old community plan and corporate plan objectives rather than thinking about what is a strategic policy is. Maybe the council need to look at paragraph 20 of the NPPF - and are more general aims and policies and need to be moved to the correct section. The NPPF also expects councils to identify shortfalls in infrastructure and community facilities and find places for these identified needs. the council does not appear to have done this and only says that any new provision should be in town centres, or that they are doing research (such as sites for education) and will report back separately outside of the local plan process. The strategy section is dominated by net-zero and a host of other environmental policies but they probably should not be here – as they sit below the top-level item of combating climate change and are more detailed policy. It may also be wise to move the detailed strategies into separate supplementary planning documents so that they can be updated more often. I suspect the requirements around zero-carbon houses, boilers, heat pumps etc will keep changing as more research is carried out.
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	No specific comments.
Tom Dunbar	I strongly agree and support the broad objectives of the borough as stated in the document. Relevant to comments made later in my response, I strongly support the Council's ambitions to response to climite emergency with decisive action and delivering new home (especially genuinely affordable housing). I encourage the Council to continue to work with organisations such as FORCE to achieve these aims. At a high level, I support the vision to increase urban greening and protecting brown and green field sites where possible.
Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	Whilst the thrust of the Objectives is generally supported it is important that interpretation of the Objectives into policy does not become too inflexible, for example it is important to recognise existing patterns of development/land use in considering new proposals (for example that not all "town centre" uses are currently located in town and district centres but that they are nonetheless worthy of support) and that there will be practical limitations on the ability of some new development to fully meet all climate change objectives so that pragmatic application of policy is important.
Victoria Barrett-Mudhoo, Lichfields on behalf of the West London NHS Trust	n/a
Louise Fluker, The Richmond Society	The strategic objectives are laudable because they are so general but there are some ones which contradict each other. For example the population of the borough is said to be ageing but how the transport needs of elderly and less mobile residents are to be met is not clear unless there is good public transport and a recognition that some people will still need to drive even if getting the rest of the population to walk or cycle is highly desirable. Likewise there is much emphasis on the concept of a 20 minute neighbourhood i.e. with residents being able to reach amenities within 20 minutes by bike or foot but such areas will be different since a cyclist will travel at least three times as far as a pedestrian in 20 minutes. Which is meant?

	There is a good emphasis on the environment as regards new housing and developments but one of the challenges is that the housing stock in Richmond is old and the draft Plan highlights that domestic emissions are the major source of carbon emissions but the draft does not address this.
Siriol Davies, Ham and Petersham Neighbourhood Forum	<p>The Ham and Petersham Neighbourhood Plan (HPNP) strategic objectives are copied below, although we recognise that HPNP was developed in conformity with the current Local Plan and previous iteration of the London Plan and does not reflect the council's declaration of Climate Emergency or the impact of the pandemic.</p> <p>HPNP objectives</p> <p>1.1.4 Character and Heritage To ensure all development enhances the character and appearance of the area and is designed to integrate with the existing architecture and green spaces. To ensure that development is only permitted in locations which are consistent with the vision for the neighbourhood.</p> <p>1.1.5 Housing To ensure the mix of any new housing has an appropriate balance in terms of tenure, size and type. Opportunities will be optimised for affordable housing. Older persons' housing, providing for a range of independence and support, will be encouraged.</p> <p>1.1.6 Green Spaces To protect and enhance existing green spaces, sites of historical and environmental significance and the semi- rural character of the area, for the benefit and enjoyment of the local and wider community and in the interest of nature conservation.</p> <p>1.1.7 Travel and Streets To create better transport links within the neighbourhood and with adjoining centres, in such a way as to enable safe walking, cycling and the use of public transport, and to minimise traffic congestion and pollution.</p> <p>1.1.8 Community Facilities To provide an appropriate range of community facilities which will promote the health, education and physical, mental and spiritual development of all residents, particularly the young and the elderly.</p> <p>1.1.9 Retail and Local Services To enhance the character, quality and distinctiveness of the neighbourhood’s three local centres to ensure viable and vibrant shopping centres serving residents and visitors. To encourage small businesses and self- employment, many based from home.</p> <p>1.1.10 Environmental Sustainability To ensure that buildings in the area achieve the highest of standards for energy and water efficiency and that flood risk is minimised.</p>
Mr & Mrs Metcalf	See above [See comment on strategic vision]
Simon Tompsett, Richmond & Twickenham Friends of the Earth	<p>P16 Responding to the climate emergency and taking action: Good statement but needs to consider existing buildings too, esp with regard to alterations and changes. If owners are seeking planning permission for extensions say, would it be possible to grant it only if they undertake other improvements to improve their energy efficiency?</p> <p>P20 “Provide a positive approach to accommodate growth across the borough”- not clear what this means. Is it the number of residents, of buildings, of households or of land occupied by buildings? Needs clarification as each of these has differing implications.</p>
Philip Briggs, Richmond Bat Species Action Plan Steering Group	The commitment to increasing biodiversity is excellent, in particular in relation to the constant pressure of development: "Require new major development to provide on-site green spaces with multi-functional benefits for biodiversity, climate change as well as health and wellbeing, including providing formal and informal education opportunities to enable people to learn about and connect with nature and biodiversity".
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.
Benjamin John	The policy of new residential builds that incorporate 'affordable' housing should be a top priority. Prices of houses in the Teddington area are grossly inflated and are available only to those people are cash rich.
Eileen Folan	Anti car use policies too aggressive. Focus on active travel does not consider needs of less mobile (older, disabled) people and can limit their ability to shop locally and enjoy our green spaces. Pedestrian safety not incompatible with 30mph speed limit on main roads, particularly with new highway code and pedestrian rights. 20mph in residential streets good but frustrating on main roads.
Serge Lourie	<p>I support the strategic objectives, especially the commitment to respond strongly to the Climate Emergency</p> <p>However, I do not feel that the Plan goes far enough as it appears not to give enough weight to the impact of the climate emergency on listed buildings and in conservation areas.</p> <p>Although I support many of the policies relating to listed buildings, I believe that tackling the climate emergency should always take priority over other policies.</p> <p>In conservaqtion areas and on listed buildings, "enhancement" should include the reduction of greenhouse gas emissions</p>
Clare Snowdon	perhaps supporting initiatives such as Transition Towns (as in Totnes), and a People's Climate/Nature Assembly, using Doughnut Economics tools in decision making, solving the issue of LED street lights decimating insect populations far more than sodium lights did, dealing with vacant properties and property-as-an-investment vs housing need (as far as possible within national policy)
Paul Luton, Cycling UK	<p>Again fully in support.</p> <p>Arguably Hampton should be included in development centres to give spread into SW of borough.</p> <p>New housing must be highly energy efficient by requirement.</p> <p>It would be a logical extension to have a taget for reducing car ownership per household.</p>
Lynda Hance	See above [comments on vision] - you are focusing on the wrong things and ignoring the things that are important for residents and which will hugely impact on us.
James Armstrong, Richmond Cycling Campaign	<p>RCC strongly agrees with the Strategic Objectives, particularly those that require measures to be taken in new developments to encourage Active Travel and improve the Public Realm, create 20 Minute Neighbourhoods, and make reference to the application of a Healthy Streets approach. It was additionally encouraging to see the holistic inclusion of Active Travel as a tool for delivering many of the Strategic Objectives.</p> <p>Focusing on the Strategic Objective: Reducing the need to travel and improving the choices for more sustainable travel, we are excited to see active and public transport featured prominently, and are largely supportive. However, we would ask that the council aims more highly than simply "maintaining" post pandemic increases in Active Travel, and instead finds appropriate wording to deliver on the Strategic Vision, which in our understanding would require levels of walking and cycling far higher than those seen post-pandemic. The Strategic Vision for example states that by 2039 Richmond will have increased levels of Active Travel.</p>
Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	<p>In relation to the strategic objectives in relation to jobs and helping businesses to grow and bounce back, the objectives should recognise that protection of all employment uses may not result in the most efficient use of land.</p> <p>In the case of outdated/unviable office space, it is not considered that the protection of these spaces will help businesses to grow.</p> <p>Encouraging the delivery of newly refurbished, viable office spaces which meet occupier demands should be the focus of the Council's strategy in relation to office space.</p>
Jim Brockbank	I strongly agree with the objective to promote working with communities and local partners including the public sector, community, and voluntary sector as set out in paragraph 2.23
Matthew Bolton	I agree with the strategic objectives in light of the climate emergency and need to reach net zero. I think that the council should be ambitious and consider workplace parking levies under its objective to reinforce the need for business and workplaces to embed sustainability at their heart.
Mark Lawson	<p>It is frankly too wordy to read on a mobile phone.</p> <p>I won't always agree with Council decision-making, or be consulted on it, but one has to applaud the consideration and intentions of those deciding the future of this wonderful borough.</p>
Liz Waters	Largely agree, but the Council needs to ensure that there are adequate facilities (eg health services, transport capacity, school places, playing fields) to support any increase in population resulting from provision of new residential developments.
Sue Clayton Smith	<p>Reducing the environmental impact of air, noise, light and odour pollution is important. Thames Water should not be allowed to regularly pollute our rivers.</p> <p>Affordable housing is important but needs to be managed carefully and the creation of high density flats should be managed against the need for family homes, ie don't just allow lots of small flats to be built.</p>

	Green spaces for residents to relax is really important, particularly now that so many people are working from home more and therefore likely to be using these type of spaces more regularly. They need to be safe and planned so that people feel safe using them, with regular park and police patrols if necessary. Planning for walkable environments which are well connected to the surrounding areas is good but the impact on the surrounding existing residents must also be taken into account.
N Maureen John	Sounds good though I'm no expert and have only glanced at the detailed document
Christine Palmer	facilities for youth needs to be enhanced and prioritised
David Marlow	P14 - P24. 1/3 of respondents with disabilities said they would no longer visit because of poor access + loss of parking (80 spaces). Overall regular visitors will reduce by 4% + all bad for retail and hospitality businesses + cultural offer. The presents DJG cafe is special, popular is being destroyed 5 storey block flats on Wharf Lane will be a blight.
Christine Duke	Strategic objectives - Agree with some, disagree with others. - Agree that previously developed land and preused buildings should be repurposed where possible as part of new developments. Cannot understand why this could not still be the case with the old Richmond upon Thames College building in Egerton Road Twickenham, which could for instance be used as a dance, drama and film making school / college with operational film studios attached as were previously situated at Teddington Riverside. - Agree that on-site green spaces, preferably with seating, should be included in all new developments. - Agree with the ideal of 20 minute neighbourhoods. - Agree with the recognition of the importance of inclusive neighbourhoods. - Agree with protecting and improving the River Thames and its tributaries and environs. Would like to see more thoughtful use in transporting goods as well as people for work as well as leisure purposes, a little more diversity. - Do not agree with enabling tall buildings and/or high density developments to develop anywhere in the Borough, this would increase temperature and pollution levels. - Do not agree that only Richmond, Twickenham, Teddington, Whitton and East Sheen should be disproportionately purposed for major new developments, is unreasonable.
Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	The RFU support the strategic objective to protect what is special and improve our areas (heritage and culture), and value the recognition that cultural facilities provide a destination and reason to visit the borough and a means to sustainably grow the visitor economy. The RFU support the objective to provide a positive approach to accomodate growth across the borough, enabling tall buildings and higher density development in 'appropriate locations'. However, it should also be noted that recent case law has clarified how Policy D9 should be interpreted, and this needs to be reflected in the wording of Policy 45 (Tall and mid-rise building zones). This point is further discussed in the detailed response letter appended to this form. [See comment in respect of Policy 45]
Mary Egan	I agree that reducing the environmental impacts of air, noise, light and odour pollution levels is crucial. That Thames Water can regularly pollute our rivers is a disgrace. Delivering genuinely affordable housing, without creating tall buildings, is very important and the necessary social and amenity infrastructure should be a prerequisite, as well as the benefits for biodiversity climate change. Safe play and relaxation areas for children and families are important. Protecting the environment and giving access to the borough's rivers will give wonderful opportunities for the education and appreciation of nature by local people. Planning for walkable environments with street connectivity is good but ensuring the local impacts of development do not damage the health and safety and amenity of existing nearby occupiers is paramount.
William Mortimer	On a personal level, I am extremely concerned that the development strategy for the whole area is proceeding without looking at a parallel definition of disaster planning and allocation of resources. Not only flooding but the possibility of a commercial airliner crash or a 'dirty bomb' from terrorist activity requires that priority is given to the safety of local citizens and the services necessary to deliver an effective recovery of services - transport, communications, provisioning, medical services and so on. Hence I am completely averse to the use of the third track over the Thames via Barnes Railway Bridge for a garden when it is of strategic significance to a Disaster Recovery plan.
David Abel	There are elements that I disagree with mainly because the wording is aspirational rather than anything concrete but it's largely sensible but not for the world that the pandemic has shown us so the whole plan is to my mind completely out of date and out of step. I entirely disagree with the objective of providing more housing for affluent middle class people like me. All our new housing should be for the people who actually make society work and any new areas of development particularly brownfield should turned into largely parkland incorporating traditional gardens or outside space and not towering flats with bars and shops. If the recent pandemic has taught us anything it is that there isn't enough space for people and these objective do not meet that. It's also sad that there is no mention in terms of facilities for new provision of allotments.
Philip Villars, WSP on behalf of Sharpe Refinery Service Limited	We welcome that the Local Plan states that it will enable opportunities to deliver new homes across the borough, and the contribution that sites such as Arlington Works can make to deliver mixed use development. We hope that the planning policies contained within the plan are supportive of these objectives and that officers will deliver upon what is stated within the Local Plan.
Alice Shackleton, on behalf of The Kew Society	We agree in principle with these, subject to comments we have made elsewhere in this response.
Jon Burrell	As someone who lives in small development of flats I am concerned about how we will make changes that help respond to the climate emergency e.g. charging points for electric vehicles in resident parking spaces and retro fitting heat pumps. There should be help for residents to plan and adapt to the changes that will be needed. Would like support for self fixing and freecycling e.g. of electricals. Need identification of wasteful use of energy e.g. digital billboards. Champion elimination of cars from boroughs parks (or placement of car parking on periphery)T.
Bridget Fox, on behalf of the Woodland Trust	We support the strategic objectives for increasing biodiversity, the quality of green spaces, and greening the borough, including trees.
Joanna Childs	All too vague. Need to have concrete measurable objectives. Very woolly about green energy and water efficiency. Also what about sewage?
Max Millington	Disagree with objective of maximising affordable housing (page 17/341). This should be consistent with London Plan requirement to optimise and should acknowledge competing objectives which mean maximisation will not always be achievable or even desirable (e.g. protection of natural green space). In connection with green space and recreational space, natural spaces (such as playing fields) should be prioritised over man-made spaces (e.g. astroturf pitches), not least for the biodiversity they offer but also because they represent a significant part of what is great about Richmond.
Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.
	<i>Note comments on site-specific allocations (including in relation to Site Allocation 9: Teddington Police Station) have generally been collated in Table 6 below.</i>

Table 3: All responses received (to question 6 on the [response form](#)) in relation to Policy 1: Living Locally and the 20-minute neighbourhood (section 4 of the draft Plan) (as received) and the Council’s response (note general comments in relation to Policy 1 are also set out in Table 6 below)

Name	Comment
Myrna Jelman	The ‘20mns’ guideline you insist upon seems to privilege walking and cycling over public transport. I would like a similar commitment to a 20mns bus ride guarantee with no more long waits for local buses! I expect much more of the richest borough in London and would like to see a fleet of smaller electric buses running on all major roads in the council at very high frequency, giving access to all in an inclusive and innovative manner and thus contributing greatly to reduced local traffic and increase in air quality, as well as providing a few more local jobs and more discovery of other areas in the council.

Robert Blakebrough	People should make their own decisions about where they live not dictated to by the State
Jon Rowles	<p>The council is proposing more of a town-centre-first vision, and then a 15-minute city approach to development. Therefore, unless there is a reboot, the council should adopt the 15-minute city name over that of a twenty-minute neighbourhood.</p> <p>The trajectory of the council's approach is going to be regressive as the council currently has an urban village approach with 14 villages - whilst the new local plan will merge some to create bigger town planning units - so in many ways that council is doing the opposite of what it is claiming to do. Maybe the council need to have a rethink and divide up the top-level places into neighbourhoods so that residents have access to essential food and healthcare needs within a short walk and town centre in a slightly longer journey?</p> <p>Its approach to work is that people will just be able to work from home, or from shared office space. All the guides to 20-minute neighbourhoods talk about providing more mixed-used developments that include workspaces like artist studios, workshops, etc.</p> <p>As mentioned above the 20-minute neighbourhoods are supposed to be about 10-minute one-way trips, but LBRUT have doubled this - and research shows most people will get into the car if the round trip is over 20 mins.</p> <p>It assumes that everyone can walk or cycle - significant numbers of the over 70's will not be able to walk or cycle to these facilities - and the council is proposing to take away car parking in many places will mean they will be cut off from essential facilities.</p> <p>These people are at a huge risk of becoming socially isolated and are likely to see a huge decrease in their quality of life. I know many people in the western fringe of the borough who has become isolated and cut off as they have aged and have become less mobile (such as having to give up their car due to age). This local plan should be doing more to reduce this isolation and improve the offerings in the smaller centres and parades.</p> <p>The plan is very much 'town centre first' and then larger parades of shops but it makes no mention of the social value of corner shops - of which there are still many, often newsagents that also sell small selections of basic groceries. The council should investigate their distribution and what can be done to protect them.</p> <p>There is also a risk to the central London economy if this policy is pursued 'too-far' as there could be disbenefits from deagglomeration - both in terms of the economy and to the individual. The Office of National Statistics has income tables that show that people who live in the borough but commute into central London earn considerably more than those who live and work here. If more people are encouraged to pursue employment close to home the result will be less financial security and lower retirement incomes which will ultimately mean the council will have a higher social care bill.</p> <p>Research undertaken for the Centre for Cities states there is a risk of isolation, territorial stigmatisation, and a widening gap between the rich and poor associated with 20-minute neighbourhoods due to reduced mobility.</p> <p>The Town & Country Planning Association state 20-minute neighbourhoods can be just gentrification if there isn't sufficient provision of affordable housing. I note that Richmond has been building the lowest number of affordable housing in London for some years, and the targets for new affordable housing are also amongst the lowest. I feel the council need to explain how this won't lead to negative social outcomes.</p> <p>The map under paragraph 4.10 needs to be done on actual walking distances - because as the crow fly can greatly exaggerate how accessible places are.</p> <p>An unintended outcome of the pandemic and more flexible working patterns is that more residents could end up working in central London because the choice is no longer commuting five days a week or working locally. Only having to work two or three days in the office could mean that local employers find that staff leave for better-paid jobs in the centre of London and they have recruitment issues.</p>
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	<p>RBGK support the concept of living locally and the 20-minute neighbourhood in general. We welcome many local visitors each year and run a number of festivals, events and exhibitions to encourage different audiences and repeat visits, alongside concessionary admissions (including as part of our universal credit programme offer); and other community outreach programmes.</p> <p>While RBGK actively encourage all visitors and staff to travel to the site by walking, cycling and public transport, this is not possible to enforce as an existing, internationally significant, major London visitor attraction and science research facility. Therefore, development in Kew Gardens cannot always meet Part (B) of the policy that suggests that a target of 75% of trips be undertaken by sustainable modes. Part C also requires all development to demonstrate how it will deliver improvements to support the locally living concept. However, many applications for RBGK relate to temporary events and installations, which will not always be able to demonstrate this. RBGK request that some flexibility is considered in relation to this policy for uses outside commercial and residential uses.</p>
Tom Dunbar	Yes, but as stated above there is an opportunity to increase and diversify the area of Twickenham Green. This is an expanding area and has little to offer especially as more people are now working from home. The Council should support local gyms, cafes, restaurants, and other amenities in the area.
Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	Whilst the thrust of the Policy is generally supported, it is essential that this approach does not become parochial, the unequivocal wording of the Borough Living Locally policy runs this risk and should be modified to take account of the importance (and advantages to the Borough) of also attracting outside investment and activity, for example visitors and tourists.
Victoria Barrett-Mudhoo, Lichfields on behalf of the West London NHS Trust	n/a
Louise Fluker, The Richmond Society	<p>Agree but with caveats about provision for less mobile residents who cannot walk or cycle: New developments should provide safe space for vehicles to drop off and collect elderly or less mobile passengers.</p> <p>The draft Plan highlights that Richmond has an ageing population whilst there is evidence of under occupancy of properties. Some of this may be because people are reluctant to downsize with all the expense incurred and there is insufficient housing provided for the elderly if they wish to continue living in Richmond. The Council could do more to encourage developers to provide housing more suited to older residents and provide incentives for people to downsize thus freeing up family accommodation.</p> <p>In the section on safer communities surely developers should be required to show explicitly how the plans for large developments have designed out crime.</p>
Siriol Davies, Ham and Petersham Neighbourhood Forum	<p>The 20-minute neighbourhood has parallels with the Neighbourhood Plan process in that it is a place based methodology which identifies neighbourhoods and analyses their character and needs, with the aim of conserving the identity and heritage, and providing the services and needs for the community.</p> <p>We note that on Map 4.1 Petersham is identified as having no local centres within the buffer zone and residents of Ham and Petersham are reliant on Richmond town Centre and Kingston Town Centre for many amenities, shops and services, albeit the road network is limited, public transport is limited to buses and improving infrastructure for sustainable and active travel to Kingston and Richmond is one of the objectives of the HPNP.</p>
Philip Briggs, Richmond Bat Species Action Plan Steering Group	This clearly has a wide range of benefits. From our perspective it's good to see this identified as an additional driver for "improving accessibility and connectivity of green infrastructure". It would be good to have something in about managing accessibility for people in a way that does not impact on biodiversity, particularly avoiding lighting green spaces at night as artificial lighting has a negative impact on nocturnal wildlife, and avoiding new infrastructure or public access that will negatively impact on wildlife.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with Policy 1 and the 20-minute neighbourhood.
Benjamin John	Any policy that encourages people from using their car to shop locally is to commended.
Eileen Folan	this will only work if rail services are protected. SWR cuts to Fulwell and beyond undermine efforts to reduce car use, and also impact on my local area Teddington. Also provision of local services such as banks. i am very disappointed that the four major banks have all closed in Teddington, resulting in shops refusing cash as nowhere to bank their takings. A better mix of shops in Teddington could be encouraged - greengrocer (no pre packed, plastic wrapped veg), butcher in high street, everyday clothing.
Catherine Rostron	<p>Where I live offers a prime example of an area which does currently support the concept of the 20 minute neighbourhood in a good way but which is currently under significant threat.</p> <p>Half of Kew Retail Park has just been sold to a developer who intends to build luxury flats. All the retail units other than Marks and Spencer will be lost to the community. Without the footfall to the other shops it is unlikely that Marks and Spencer will survive for long.</p> <p>Between 2001 and 2019 the population of Kew ward increased by over 27%. The retail park is the main non-tourist retail site in the area. Without it the 12,000 residents will be served by only a handful of corner shops.</p> <p>The retail park provides for most daily shopping needs within walking or cycling distance for Kew’s residents e.g. pharmacy, clothing, food and basic household goods. It goes a long way towards supporting a ‘20 minute neighbourhood’.</p> <p>Access along the tow path also provides a safe walking ir cycling route which also benefits from lower levels of pollution.</p> <p>Without the retail park car journeys to the larger supermarkets around the periphery of Kew will have to increase (Richmond, Brentford etc) as will congestion and air pollution.</p> <p>While I support the need for more housing in London, particularly social housing, communities also need viable infrastructure.</p>

	I can only really comment about my local neighbourhood, here it feels as if the facilities to support the ‘20 minute neighbourhood’ are in shorter supply than housing.
Andrew Barnard	<p>This is an idealistic vision which will not suit all in the community. Not everyone can walk or use a bike, nor indeed may they wish to. The policy risks creating 'islands' (were it to be implemented) with extensive duplication and/or significant costs. The Council's ability to make the investments envisaged is extremely limited and will depend on the private sector who will make judgements made based on commercial viability. However, the Council can help by reducing business rates and associated costs to encourage businesses to invest and employ staff.</p> <p>Great care must be taken not to extrapolate the exceptional experiences of the past 2 years to build a vision for fifteen years hence. Changes in behaviour have been by force of circumstance. We live in close proximity to all the extraordinary assets of one of the world's major cities - London - and imagining that the inhabitants of Richmond will somehow turn in themselves over a strategic timeframe seems entirely unlikely.</p>
Paul Luton, Cycling UK	Improvement of walking and cycling availability should be required in all areas.
Lynda Hance	It's a nonsense to imagine that people living in a London Borough won't travel into Surrey or elsewhere in London to work, for shopping, for pleasure (theatres etc) to other transport hubs (Waterloo, Heathrow, the tube, etc). You have stated that Whitton isn't well served by transport links so this policy doesn't tie in with that.
Clare Snowdon	I love the 20 minute neighbourhood idea. It would be nice to see provision for people with disabilities here so that they can see how they fit into this neighbourhood
Jim Brockbank	The policy of the 20 minute neighbourhood, living locally and encouraging easy access through active travel eg walking and cycling is excellent
James Armstrong, Richmond Cycling Campaign	<p>RCC strongly agrees with Policy 1, and welcomes the strong commitment of the council to the Living Locally concept & 20 Minute Neighbourhoods. The measures included will go a long way towards leveraging the planning system to enable modal shift to Active and Sustainable Travel modes.</p> <p>We wish to ask for clarification regarding Policy 1C, Point 6. Is the wording intended to be interpreted such that relevant proposals must demonstrate how they will improve local walking and cycling routes, ONLY in areas with lower levels of public transport accessibility or higher levels of health deprivation and disability? If so, we would ask that this is amended such that major developments located in ALL PTAL levels must demonstrate how they will improve local walking and cycling routes. This is important because of the focus in Policy 2 on the direction of higher density development towards high PTAL level areas, which likely present the largest opportunities for gains in Active Travel use.</p>
James Stevens, Home Builders Federation (HBF)	<p>The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational plc’s, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year. Recent research by the Government has estimated that housebuilders have made a significant contribution to the nation’s infrastructure, providing some £21 billion towards infrastructure of all types including affordable housing since 2005.</p> <p>We have noted the site allocations and the rationale behind the 400 metre and 800 metre active travelling zones. In view of the relatively small size of the borough, and the constraints on the supply of land for housing, but the high levels of public transport connectivity - most locations are within 800 metres walking distance of a train or tube station and even those few areas beyond this distance are still a feasible distance to walk or cycle – every area of the borough should be considered capable of contributing to future housing supply. Nowhere should be placed off limits on grounds of public transport connectivity.</p>
Lynne Bailey	In the same theme as my comments on Section 3, this policy feels like it is excluding the elderly and disabled. Not everyone is capable of walking or cycling for 20 minutes and doesn't want to be continually reminded of this! I am not suggesting you disregard the policy but, rather, expand it to cater for the less mobile in the borough. Remember that not everyone who is mobility limited has a blue badge. Please reword to show you are considering all residents and not simply disregarding some of the more vulnerable.
Matthew Bolton	<p>Policy 1 1 under point C should include the need to have a 'Healthy Streets' Transport Assessment for Major developments of 10 or more residential units or non-residential development of 500sqm of floorspace or more. Whilst the Local Plan Policy adheres to the same principles the TfL document categorises how developments should contribute to the TfL objective of healthy streets that promote healthy travel and environments.</p> <p>I would highlight the current council policy of offering 30 minutes free car parking to residents undermines the objective of the 20-minute neighbourhood. This scheme encourages motorists to drive to shops, often for short trips, as it incentivises them with 30 minutes free parking. This free parking should be cut down. This scheme also ensures that on street bays are often occupied when there would be considerably better uses to the high street public realm such as parklets, tree planting and cycle parking. To support the objective of living locally and 20 minute neighbourhoods, the council should consider reviewing the free parking scheme and put the revenue gained from parking receipts into public realm enhancements and cycle infrastructure improvements.</p> <p>I note the council has recently approved the East Twickenham public realm improvements which is commended. This should be replicated more widely through improving the pedestrian environment on all its High Streets. I would recommend Broad Street in Teddington as a potential priority area. This has two sides of car parking and narrow footways. Buses are frequently blocked due to the narrow road as a result of wide cars parking on both sides. These cars could comfortably be accommodated within the North Lane Car Parks, as shown in the Ellery Hall Transport Assessment. As a result, the pedestrian environment is not as good as it could be, which is a key component of the success of 20 minute neighbourhoods.</p> <p>I would add that free car parking and narrow footways along Hampton Hill High Street also undermines the 20 minute neighbourhood objective.</p>
EE McClelland	I have concerns about providing car-free development as many people will choose to park elsewhere on streets making congestion worse. I believe in a suburb like Teddington car use is often required as larger stores such as Sainsburys are distant and as a family-oriented town parents often require a car for baby and child transport. This is NOT always easy on public transport if you want your child to participate in activities with their peers.
Mark Lawson	<p>I will read the document in more detail on my laptop this evening.</p> <p>The implications and changes resulting from the Pandemic are certainly interesting and the Council seem to be preparing for those changes which are complex and varied. For example I happen to feel that non-mask wearing on public transport and crime in the Inner London boroughs is encouraging residents to stay local, certainly for their leisure time.</p>
Anna Kendall	I have been living locally for 35 years. I hear my surgery has to move and would like it to move to the site described in sectopn7 as site allocation 9, so it stays local and can support initiatives such as the Whatsapp groups set up in Covid time for Albert Road and Park Road which helped with collecting prescriptions etc...
Olivier Somenzi	let's not forget that a 20-min walk or bike ride might not be possible for everybody (older people, people with disabilities etc) - what's the plan for these vulnerable populations?
Sue Clayton Smith	<p>A great idea and goal but this will only be achieved if the local high streets are attractive and have an appropriate mix of outlets. There also needs to be good access to health and education, as well as sufficient green space so that it is not too overcrowded. Amenities need to be provided to such green spaces too, eg toilets on Richmond and Twickenham Greens to avoid the adjacent residential streets from being used as public toilets.</p> <p>Local walking and cycling routes to be enhanced and developed.</p>
N Maureen John	Sounds good though again - I'm no expert and have only glanced at the document
David Marlow	<u>BUT</u> Council is ignoring residents with disabilities and the fact that not everyone can walk or cycle. See DJG comments. The planned Ellera Hall in Teddington is far less convenient than present building (as well as being of incongruous design and out of character). A site next to the Teddington Library and adjacent bus stops was rejected.
Christine Duke	Agree for the most part with the ideal of the 20 minute neighbourhood. However, consideration needs to be given to the fact that not everyone is able to cover the same distance in 20 minutes and could take twice as long or more (40 min +) to get to local shops and amenities. After shopping etc. then having to another 40 + minutes to return home, exhausted and often in pain, makes far easier said than done. Also many elderly, disabled and vulnerable people are afraid to go out anywhere alone for fear of falling over, crime and other accidents etc. The condition of roads and footpaths will need to be improved greatly, across the Borough. Footpaths will need to be well lit and maintained. There will need to be more resting points/seats, more localised accessible toilet facilities, visible community policing. Clear enforcement of the ideal of "pavements are for people" is needed as many people are fearful of being hit or knocked over by electric scooter riders, and cyclists etc. using the pavements often at high speeds, and it is difficult for the less able to move out of the way to avoid an accident, more time is needed to cross roads, timed crossings do not allow enough time to cross safely. Overall would like to see the views of Disability charities and organisations sought for their input, so that their views can be taken on the reality of getting around for shopping, socialising etc.
Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	As noted in response to Question 4 [See comment in respect of the strategic vision] , the RFU support the living locally approach for access to essential services to fulfill daily needs. However, the vision and the corresponding policy (Policy 1) as currently drafted applies to 'all development, except householder applications', and needs to clarify exclusions for Twickenham Stadium as one of London's premier entertainment venues and an nationally significant sporting venue. To account for this, we would suggest that Policy 1 (Part C) be redrafted as described in the detailed response appended to this form. [See comment in respect of Policy 1]
Mary Egan	The policy of the 20 minute neighbourhood is an excellent goal - ensuring access to food and necessities by creating attractive high streets, health and education by providing good open spaces and work good public transport as well as access to recreational and cultural areas.

	Developers should comply with these aims, by creating well designed and finished low rise housing with adequate on site parking. Local walking and cycling routes should be increased.
David Abel	Having sounded negative in my previous answers it would be churlish of me not to fully applaud this. It’s an excellent idea so long as it incorporates things like access to a GP surgery
Philip Villars, WSP on behalf of Sharpe Refinery Service Limited	The Arlington Works site is within a short walk of the local centre of St Margaret’s and other local facilities such as parks, train and bus services. The Arlington Works site has the potential to positively contribution towards the 20-minute neighbourhood of St Margarets.
Alice Shackleton, on behalf of The Kew Society	<div>- in principle, The Kew Society is supportive of this concept</div> <div>- there are some requirements for this to work: one is that a high density of residential development is required in order for there to be a large enough population to support a "living locally" environment - to have businesses, education, health, culture, retail and other elements of a viable community as envisaged.</div> <div>- This concept is fine if one is mobile. Whilst the increasing proportion of ageing people in the Borough population is noted, there needs to be more recognition that even those who are relatively mobile may not be able or want to walk or cycle for twenty minutes or at all and also may not be able to carry grocery shopping, for example. They may need carers who themselves may need a vehicle to cater for their needs (and travel to various customers). Not to make provision for these needs risks excluding a growing part of the population.</div> <div>- Within Kew the distance to walk to Kew Gardens Station and bus stops for the older people can be daunting, for example, it is a significant distance from the Kew Riverside development to the Underground station. It may be a short distance for a fit young person who could walk or cycle.</div> <div>- The draft Local Plan considers the increasing ageing population in terms of adult social care rather than in meeting their needs for transport. Many of the older population are relatively fit but not comparable to the young and so not able to walk or cycle to meet all their needs.</div>
Jon Burrell	Totally support active travel and cycling but something needs to be done about high rates of bike theft which undermine this.
Hilary Pereira, River Thames Society	Not a matter on which comments from the RTS would be appropriate
Laura Hutson, Sport England	Sport England is fully supportive of this policy which helps create environments that make it easier to be physically active. This is also in line with our Active Design guidance as outlined below. [See comment in relation to Uniting the Movement and Active Environments]
Bridget Fox, on behalf of the Woodland Trust	Support B8. "improving accessibility and connectivity of green infrastructure".
Joanna Childs	Nice idea, but the whole point of living in a city is access interesting jobs and culture otherwise we’d all live in Tavistock. Will you relocate the Financial Services sector, the ROH, British Museum, RA, National Gallery, Barbican etc to LBRUT? In pre-industrial London fisherman dried their nets by Kew Bridge and had no bathrooms.
Joan Gibson	Would think some policies to encourage active travel such as green routes, and exercise information would help folks leave the car at home without costing LBRuT a fortune. Hounslow's beat the streets is a good example which has been shown to work. Also planning need to change so they take a wider view of developments and make sure any changes include through routes to improve walking / cycling. For instance cut throughs from Redfern Avenue to Heathfield rec could have been organised with the THS development. Have any cut throughs been organised for the Brewery development etc. etc.
Max Millington	I am wary of the numerous references to cycling: more cycle lanes and rights for cyclists are not to my mind the answer for Richmond. The needs of pedestrians, public transport users and drivers (of less polluting vehicles) should not be deprioritised. I don't think it is right to say LBRuT needs to be more locally dependent - a great many residents work and have educational requirements in Central London and in the wider area, so it would be inappropriate not to provide adequately for that.
Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with Policy 1 and the 20-minute neighbourhood.
	<i>Note comments on site-specific allocations (including in relation to Site Allocation 9: Teddington Police Station) have generally been collated in Table 6 below.</i>

Table 4: All responses received (to question 7 on the [response form](#)) in relation to Policy 2. Spatial Strategy: Managing change in the borough (section 4 of the draft Plan) (as received) and the Council’s response
(note general comments in relation to Policy 2 are also set out in Table 6 below)

Name	Comment
Caroline Wren	Broadly speaking this section all makes sense: welcome the commitment to brownfield development and sensitivity to place-based character in design, consideration of embodied carbon, and the other principles.
Robert Blakebrough	Certainly do not agree with Policy 2 -A "higher density development including homes," Complete madness in a city/country already hugely over populated i.e. UK population has increased approx. ten fold in the last 300 years. Solutions should look at reducing population as current situation is unsustainable
Jon Rowles	<div>This sounds OK in practice, however, as the council is adopting a 20-meter walking distance/800-meter buffer development can take place in 95% of the borough. Development needs to be directed towards the 200-meter buffer, and to a lesser extent, the 400-meter buffer - and these need to be actual walking distances.</div> <div>Section B - the presumption in favour of refurbishment could end up being a 'maladaptation' as converting buildings can involve using more carbon. Reading through the research - it's often the case that only 'lite' refurbishment saves carbon. It also does not consider the benefits of intensification that rebuilding can bring to town centres and the reduced need to build on green land in the countryside.</div> <div>Rebuilding also saves carbon after about 30 years and most domestic buildings will last over 100 years – so on that timeframe it is the right thing to do. I get the impression the council is trying to make development more difficult.</div> <div>With the high property prices in the borough, most refurbishment schemes are very intensive with places often gutted back to the shell - and then most of the shell is often replaced too. There would have to be some very robust calculations to show that refurbishment uses less carbon.</div>
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	<div>RBGK generally agree with this policy. However, request that Part (A) of the policy reflects that higher density development, which is directed to sites in the town centres or highly accessible spaces, should also have regard to the impact on townscape character, heritage assets, and key views. Each application for development must be assessed on a case-by-case basis, and just because a development is proposed for a highly accessible, town centre location, does not necessarily mean that it will be acceptable in townscape and heritage terms.</div> <div>RBGK also seek clarification on the "key diagram" on page 28. A large proportion of Kew Gardens is designated as an "incremental intensification area", as well as an "area deficient in public open space". The Royal Botanic Gardens at Kew is a World Heritage Site; located in a Conservation Area; registered as a Grade I Registered Park and Garden of Special Historic Interest; and manages a total of forty-six listed buildings and structures. It provides approximately 300 acres of open space and gardens, and is heavily protected in policy terms, therefore it is unclear why these designations have been partially applied to Kew and its immediate setting, which is also very sensitive. RBGK request that these designations are removed, or their relevance to Kew Gardens be clarified in the policy text.</div>
Tom Dunbar	I agree but the growth needs to be proportionate to a) the need to protect green / open spaces; b) to ensure the right infrastructure and amenities are in place to meet needs (especially public transport).
Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	Policy 2 [A] fails to recognize that there are reasonable opportunites for the redevelopment of existing sites which lie outside of town and district centres and which may not enjoy good public transport connections but which can nonetheless make useful contributions to the Borough.

Victoria Barrett-Mudhoo, Lichfields on behalf of the West London NHS Trust	n/a
Louise Fluker, The Richmond Society	We agree with the general approach and that the Plan identifies the specific challenges to LBRUTC in meeting its targets of affordable housing because so little land is available. To that extent focusing on reusing land:is sensible. There is however an issue which is not sufficiently debated which is that the Council has identified that most of the CO2 emissions are from domestic consumers yet the housing stock in Richmond is old with specific areas containing many historic and listed buildings, It is unclear how both objectives can be reconciled (i.e. preserving historic buildings vs modernising them sufficiently)
Siriol Davies, Ham and Petersham Neighbourhood Forum	A.Ham and Petersham also has a very low PTAL. We note that Ham Close redevelopment (site allocation) would lead to a significant increase in residents and trips, which need to be met by associated services, public transport and active travel infrastructure. B. It is good to see recognition of embodied energy and support for reuse and conversion of existing ubildings to minimise embodied carbon with a presumption favour of refurbishment, however reference to retrofitting/ deep retrofitting should be included here so that when buildings are refurbished they are also upgraded to improve the fabric performance to achieve net zero by 2050, and to make a strategy which addresses the challenge of retrofit in conservation areas.
Philip Briggs, Richmond Bat Species Action Plan Steering Group	Really good to see the commitment to growth being delivered in a sustainable way, with supporting infrastructure, while tackling the climate emergency and biodiversity crisis, limiting new housing to already developed land.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with Policy 2, Spatial Strategy: Managing Change in th borough.
Carolyn Doughty	It is crucial that South western railways are encouraged to maintain the previous level of service from Shepperton to London Waterloo. The current reduction is trains results in severe disruption to commuting times and overly busy trains, particularly at peak times.
Deborah Waddon	The opportunity to receive affordable housing is extremely limited. It is very sad the opportunity is not there to those that have grown up here and worked here to support the local economy and to continue to be a support to their families have little or no chance of affordable accommodation.
Paul Luton, Cycling UK	”places that are well connected by.....cycling “ . In an area the size of Richmond borough all there is no reason why all places should not be readily accessible by cycling especially taking into account e-cycles. Perhaps question forecasts of demand for retail space given growth in on-line shopping.
Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	In relation to Part B, we agree that prioritising the use of previously developed land, including the reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment will deliver grown in a sustainable way. The continued use and reuse of listed buildings should also be prioritised and it should be recognised that the conversion of listed buildings to alternative uses may secure their future, thereby representing sustainable development.
Clare Snowdon	I would like to see strong policy on protecting habitat and connectivity of green spaces - for instance designating the Sainsburys St Clares car park as MOL and the introduction of urban hedgerows, support for Nature-Connected Neighbourhoods etc
Jim Brockbank	The ‘living locally’ concept makes a lot of sense. But paragraph B11 which relates to the Major’s Healthy Streets Approach to encourage walking and cycling are the choices made for local journeys is significantly let down if the health and social care facilities locally are not ‘fit for purpose. This is relevant to the proposal for site allocation 9 at Teddington Police Station- see below. The local plan acknowledges that there are limited opportunities for development in the locality and the opportunity to develop the site allocation 9 as a community / social infrastructure should not be missed
James Armstrong, Richmond Cycling Campaign	RCC agrees with Policy 2, noting with particular interest the proposal to direct higher density development towards areas that are well connected by public transport, walking and cycling. If Policy 2 was to be improved, note could be made of the need to avoid further development in areas that would encourage motor vehicle use.
Mark Lawson	I think we all appreciate that we live in the Royal Borough of Richmond for a reason. Intentions are honourable.
Graeme Fraser-Watson, The Teddington Society (Planning Group)	See Question 10 [comments added under Section 7 Place-based Strategy for Teddington & Hampton Wick in Table 6]
Sue Clayton Smith	Plans for housing, retail and employment related development need to also take into account the impact on the local environment and in particular the need for accessible green spaces for exercise and relaxation.
N Maureen John	Generally agree
David Marlow	<u>BUT</u> the Council is not reusing the present safe, enclosed, popular amenities of Diamond Jubilee Gardens (which in fact was the rubble from the former swimming pool, very eco efficient). Proposal is <u>not</u> an overall enhancement of environment, local character - and certainly not another pub - we have plenty of pubs in Twickenham.
Christine Duke	Agree with some, disagree with others. - Do not agree with the plans/strategies to direct major developments into the five town centres of Richmond, Twickenham, Teddington, Whitton and East Sheen. Consider that this would be disproportionate and unfair overdevelopment of the respective townscapes which would lead to further congestion and pollution as well as concrete sprawl in each of the respective areas and could well lead to undesirable discord and division between local residents and business interests. - Do not agree that dispersing the major developments across the borough would/ <u>could</u> create unsustainable patterns of development, rather consider that doing so would evenly distribute both the benefits and disbenefits of the same. - Agree with repurposing pre-used sites and buildings. - Do not agree with the need to develop high rise building anywhere in the Borough. - Suggest sites/buildings could be used/purposed for shared use, needing less development overall.
Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	The RFU support the Local Plan objective to direct new higher density development to places that are well connected to jobs, services, infrastructure and amenities, as well as town centres. The supporting text to Policy 2 references the boroughwide Open Land Review alongside other studies which have been undertaken to form the basis for a holistic understanding of the borough's constraints and capacity for growth. The supporting text states that: 'the majority of the MOL has been assessed as performing strongly, with some areas scoring weakly against the MOL criteria'. Part of the Twickenham Stadium land pancel is within the Kneller Chase Bridge MOL area (no. 36 in the Open Land Review). The Review confirms: 'The eastern edge of the parcel, hard standing associated with Twickenham Stadium, meets none of the MOL criteria and it is recommended that its MOL status is considered further'. This needs to be acknowledged in the Site Allocation 13. Further commentary on this point and Draft Policy 35 and the MOL Policy Map designation is provided within the attached detailed response letter. [See comment in respect of Policy 35]
Mary Egan	Plans to meet the needs for Housing, Retail and Employment should be taking into account the urgent need for oases of nature, however small, to refresh, educate and make the citizens of Richmond able to exercise healthily and enjoy the spaces available especially in the urban environment.
David Abel	I strongly disagree with building intense developments anywhere in the borough, but particularly where the affordable housing provision forces poorer families into spaces a fraction of the size of others. I also do not agree that plonking a massive development or developments in to an are will be beneficial to that area - the new Mortlake Riverside development will have a devastating affect on East Sheen for example.

Philip Villars, WSP on behalf of Sharpe Refinery Service Limited	We welcome that the Council has recognised that the use of previously developed land can contribute to housing targets which accords with the London Plan.
Alice Shackleton, on behalf of The Kew Society	We agree with this but note that this will have to address the challenge of accommodating protection of protected open lands and heritage assets with satisfying perceived strategic needs as highlighted in A to D of Policy 2 and the accompanying paragraphs
Hilary Pereira, River Thames Society	Not a matter on which comments from the RTS would be appropriate
Bridget Fox, on behalf of the Woodland Trust	Support C. "Development in the borough will promote the provision of green infrastructure that creates resilience and helps mitigate the impacts of climate change".
Joanna Childs	Strongly disagree with the proliferation of tall buildings. Incidents such as Grenfell have shown that while these can be safe when first constructed it is difficult to control this thereafter. They blight the landscape, cast deep shade over their neighbours, generate wind tunnels and put huge pressure on local infrastructure. Are we planning to incarcerate our children in towers and allow them out now and then for organised sport on astroturf?
Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with Policy 2, Spatial Strategy: Managing Change in th borough.
	<i>Note comments on site-specific allocations (including in relation to Site Allocation 9: Teddington Police Station) have generally been collated in Table 6 below.</i>

Table 5: All responses received (to question 8 on the [response form](#)) in relation to the place-based strategies (sections 6 to 14 of the draft Plan) (as received) and the Council’s response
(note general comments in relation to the Place-based strategies and site allocations are also set out in Table 6 below)

Name	Comment
Caroline Wren	Only a few comments: <ul style="list-style-type: none">• are we happy that the artificial grass pitch (3G) mentioned for Richmond College is appropriate, given the importance for the environment of good drainage in the areas by the river (set out clearly in the Strategic Flood Risk Assessment doc)? I'm guessing it's for financial reasons but I'm not sure that the extra revenue potential, or the cost savings on maintenance, are sufficient to justify a large artificial grass pitch in an area liable to flood?• relatedly, LBRuT is supposed to be working with the EA, Thames Water Utilities & TfL to create a flood channel running parallel to the Thames, upstream from Richmond - it was recommended in 2010 but still not approved - is this plan the place to address that?• Teddington weir was also mentioned in that SFRA as an asset that needed improving - what's the plan?• Fulwell's strategy was unclear and poorly developed (in Hampton Hill area): it's one of the few places in the plan which is described as having a vague character and not hanging together all that well, but the doc doesn't really go into any details about what might be enacted as a result - can we have more explanation on the vision here?
Jon Rowles	The key diagram - the areas for intensification overshades areas of MOL and green belt. the shading should not go over these areas to make clear the council is not opening these areas up for development. The division of the borough up into 9 high-level places - rather than the previous 14 villages means that the council is moving away from livable neighbourhoods. Disadvantaged areas such as Heathfield and Hampton North are likely to lose out under this approach. The strategies and other initiative sections, look like they have been put together quickly by reviewing old documentation and that the engagement and empirical research that would normally go into preparing a new plan has not taken place. Many areas of outer London are suffering from relative decline due to the improvements to inner-city living many younger people (20-40) prefer to live in central London and this has skewed the demographics in the borough. I would expect to see more details on how the different areas will be regenerated. Hounslow in comparison to proposing a large number of public transport improvements whilst Richmond is only talking about cycling. The quality of life for people living in areas such as Fulwell and Hampton would be massively improved if Crossrail 2 was built but this local plan is not championing it, and also seems happy for the poor rail services and low PTAL ratings to continue.
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	RBGK generally agreed with the placebased strategies. However, have some comments on, and seek clarification on, a number of policies as set out in section C of this form below, in relation to: - Policy 2 (Spatial Strategy), particularly Part (A) and they key diagram on page 28; - Section 12 (Place-based strategy for Kew); - Site allocations 32 and 33; - Policy 4 (Minimising greenhouse gas emissions and promoting energy efficiency), specifically Part (D) and Part (E); - Policy 5 (Energy infrastructure), specifically Part (C); - Policy 26 (Visitor economy); - Policy 29 (Designated heritage assets), specifically Part (A)(3) and Part F; - Policy 31 (Views and vistas); - Policy 32 (Royal Botanic Gardens, Kew World Heritage Site); - Policy 45 (Tall and mid-rise building zones). - Policy 47 Sustainable travel choices), specifically Part I [See other comments].
Victoria Barrett-Mudhoo, Lichfields on behalf of the West London NHS Trust	West London NHS Trust supports the principle of place based strategy for Ham, Petersham and Richmond Park (Section 10) and the vision to build on the identity of Ham and Petersham as a sustainable mixed communitiy giving greater opportunities to live and work. The Trust particularly supports the continued recognition in the policy of the Cassel Hospital site for development. We note that the text states that "There is also an opportunity if Cassel Hospital is declared surplus to requirements (Site Allocation 23, Neighbourhood Plan Policy Q5) for conversion to community facilities." In line with the adopted Site Allocation wording, this wording should reflect that potential redevelopment for residential uses could be considered. We therefore request that the wording is amended to "...for conversion to community facilities and / or potential redevelopment for residential uses." We comment further on the site allocation in response to Question 9. [See comment in relation to Cassel Hospital]
Louise Fluker, The Richmond Society	Place based strategy for Richmond Park: we agree with the strategic objective that Riverside (E2) has a high sensitivity to change, due to openness and visual aesthetic of the area. Richmond Park (E3) is recognised as having high sensitivity to change, with the high value and susceptibility of the areas meaning that significant change is unlikely to be appropriate. Place based strategy for Richmond Hill and Richmond: we agree with the overall strategy but the devil is in the detail and getting the right balance between attracting visitors but not to the detriment of residents is very difficult Piloting a clean air zone is good in principle but again it’s the detail that matters. The biggest polluters are the heavy goods vehicles and buses. Reducing their emissions would help significantly.
Siriol Davies, Ham and Petersham Neighbourhood Forum	PLACE-BASED STRATEGY FOR HAM, PETERSHAM & RICHMOND PARK The Local Plan character analysis identifies 3-character areas, whilst the Neighbourhood Plan adds a more detailed differentiation of areas. p.91 We welcome reference to Neighbourhood Plan and that they should be read together. It notes and the Neighbourhood Plan was prepared in the context of the 2018 Local Plan and previous iteration of the London Plan. It notes where the Neighbourhood Plan diverges from the Local Plan, justified through local evidence. p.92 We note reference to The Urban Design Study with design guidance for each character area. The Urban Design Study includes listed buildings and conservations areas. What is the status of the Urban Design Study and its relationship to existing conservation area appraisals. Urban Design Study link Executive Summary here Urban Design Study shows capacity for development with Ham Close as high and E1 (Ham and Petersham Residential character area) as medium-medium/low. There are also spots of med-high capacity at Cassell Hospital, the Convent and Latchmere Close. We support the ‘vision’ which cites and builds on the Neighbourhood Plan vision. P.93 We note reference to Neighbourhood Plan policies and ‘community proposals’.

	[See comment on site allocation for Ham Close and comment on site allocation for Cassel Hospital]
Philip Briggs, Richmond Bat Species Action Plan Steering Group	Biodiversity isn't specifically mentioned in all of these. They all have aims to protect and expand green networks but the specifics mostly relate to the benefit for people. Please could we have protecting and increasing biodiversity and wildlife corridors included as a key part of wording about green networks in each place-based strategy? It is excellent to see explicit requirements to protect and enhance adjacent river wildlife corridors in several of the Site Allocations. However, a number of the Site Allocations which would be major developments do not specify anything relating to the Council's commitment to “...encourage the creation of multi-functional green space wildlife or ecological corridors within new development site layouts...” (from section 21.7). More specific comments are provided in Part C below.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Our response here on the Place-based Strategy: Richmond Town and Richmond Hill and Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree.
Eileen Folan	Concerned that the focus seems to be on buildings and office space, rather than resident needs - eg GP surgery, access to police ,
Paul Luton, Cycling UK	Look again at report comissioned to reduce car dominance in Hampton - Hampton Hill. This seems to have been filed away as too brave.
Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	In relation to Richmond and Richmond Hill the draft policy states:- "Future Development in this place is expected to: - encourage the provision of office floorspace and new flexible workspaces within the town centre and intensification of existing employment sites to provide for jobs and support local businesses". We are of the view that this needs to recognise that only viable employment sites will be intensified and that in order to secure vibrancy and flexibility, outdated/unviable office accommodation could be converted to other more viable uses.
Jim Brockbank	Overall I strongly agree with the innovative concept of the place based strategies outlined.
James Armstrong, Richmond Cycling Campaign	RCC is overall supportive of the place based strategies, and particularly welcomes the policies included that aim to reduce car dominance, encourage mixed use development, improve routes for walking and cycling, encourage pedestrian permeability, high street pedestrianisation, and interchanging with/promoting bus and train use. However we notice that these measures (excluding the mixed use of land) are not consistently included in all the place based strategies, something that will be necessary if the plan is to deliver on the proposed Strategic Vision, the borough's transport modal share targets, and the implementation of the 20 Minute Neighbourhood concept through the Local Plan. Similarly, we notice that within the context sections of the site proposals, cycling, walking and public transport are often not mentioned (or only public transport is). This is particularly concerning when considering the larger and more dense sites proposed to be allocated, as these promise the largest possibility to change and embed more positive transport habits.
Matthew Bolton	Under place based strategy 6: Hampton, Hanworth Homebase should be added as a potential mixed use residential/ commercial intensification site allocation. This is a retail park site with a large proportion of the site as surface level car parking. As seen elsewhere in the borough (Richmond Homebase) and in neighbouring boroughs (Kingston Homebase and Syon Lane Homebase) there is a clear desire by the landowoner of these sites to convert their use to residential. The Local Plan makes no reference to the potential redevelopment of Hanworth Homebase for a residential scheme with affordable housing. Also the Molesey Telephone Exchnage in Hampton is not allocated as a site. Elsewhere across the borough, the place-based strategies often contain telephone exchanges that may be disposed. This site should also be included.
Andrew Whitehead	I strongly disagree with content in section 6, “Place-based Strategy for Hampton & Hampton Hill” and specifically its sub-section “Allocation 1: Hampton Square, Hampton”. The “Site Proposal” contains an implicit intention to develop the only part of the Hampton Square Allocation that is designated as an Other Open Land of Townscape Importance (OOLTI), and which contains a much-used children’s playground. [See comment in relation to Site Allocation 1]
Mark Lawson	I am commenting specifically on Section 7 of the plan. I am specifically on the Teddington Police station site. If you want to build affordable housing next to the Stoop, that is fine as I do not frequent that rugby club or the larger stadium across the road, where I find the tickets too expensive.
Graeme Fraser-Watson, The Teddington Society (Planning Group)	See Question 10 [comments added under Section 7 Place-based Strategy for Teddington & Hampton Wick in Table 6]
Sue Clayton Smith	Twickenham Town Centre and Twickenham Green have a high sensitivity to change and require as much naturalising as possible because of the high density of development in the surrounding streets. Access to green space is vitally important for the health and wellbeing of local residents.
N Maureen John	The 20 minute neighbourhood plan is an interesting concept
Alexandra Bamford, Boyer Planning on behalf of Twickenham Film Studios	Agree with '8 Place based strategy for Twickenham, Strawberry Hill & St Margarets' and specifc reference to the Studios. We consider that 'Arlington Works' should be designated as a 'Locally Significant Industrial Site'.
Christine Duke	Agree that place based strategies could give the benefit of experience and experience of community in recognised areas however could also lead to division across the Borough where each recognised area seeks to protect its own interests rather than view the overall quality of life experience of the Borough as a whole. - Do not agree with overdevelopment of town centres of Richmond, Twickenham, Teddington, Whitton and East Sheen.
Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	The Twickenham Stadium is within the Twickenham, Strawberry Hill & St Margarets area, specifically, Twickenham Residential. The supporting text acknowledges that the area includes Twickenham’s nationally important rugby venues at Twickenham Stadium, a world famous landmark and the home of Rugby Union. The Urban Design Study (2021) notes that Twickenham Residential has high sensitivity to change. The overall strategy states that for Twickenham Residential (C2) the strategy is to conserve, enhance and improve the character of this area by enhancing its legibility and the consistency of its built environment. We consider inclusion of the Stadium within the Twickenham Residential sub-area conflicts with the following statement within the 'vision' section of the place-based strategy: 'Twickenham’s important sporting and cultural attractions will be maximised'. We consider that to properly enhance the role sporting role of Twickenham Stadium (Site Allocation 13), the Stadium and its immediate surrounds should form part of its own character area; or, specific exceptions should be referenced in Place Based Strategy 8. This is further considered within the detailed response letter. [See comment in respect of Site Allocation 13. Twickenham Stadium]
Mary Egan	I would suggest that Twickenham town centre and the Green have a high sensitivity to change and require as much naturalising as possible because of the tightly packed roads with terraced houses. Access to Green spaces is of paramount importance to the citizen's mental health.
Chris Toop	I strongly object to the fact that the proposals for key sites such as the Homebase site, The Sainsburys site and Kew Retail Park appear to replicate the aspirations of developers for those sites thereby facilitating approval of their proposals.
David Abel	I vehemently disagree with the decision taken to subdivide the borough into discreet sections as though impact on one area has npc impact on another. A holistic approach across the whole of the space should be taken not piecemeal carving up. For example East Sheen has within it the Mortlake Riverside development and Barnes hospital but it would appear that Manor Road and Kew retail will have no impact at all as they exist in two separate pocket universes.

Clare Snowdon	It's good to see requirements such as habitat corridors included here
Philip Villars, WSP on behalf of Sharpe Refinery Service Limited	Place-Based Strategy for Twickenham, Strawberry Hill and St Margarets. The map attached to the area profile is inaccurate as it does not differentiate between St Margarets Local Centre and St Margarets residential. In order to be robust it should differentiate. As an aside, the policy attached to this section does not have a number or title. We therefore assume that the policy is to be known as Policy 8 - Place-Based Strategy for Twickenham, Strawberry Hill and St Margarets. Broadly we support the overall vision for St Margarets which is to maintain an attractive residential character to the area. Having said this, we are of the view that St Margarets Local Centre and its immediate surroundings are mixed use in nature and have the potential to further develop a mixed use nature. This should be recognised within the policy for the area, as the mixed use nature is an important component of the local economy which should be identified and supported. We do not understand or agree with the rationale used to select or discount sites for inclusion within site allocations within the area. Our client's site, Arlington Works could support a mixed use (commercial and residential) regeneration scheme on a key site within the area, however it has been discounted. The Local Plan should provide a place based policy document to support development within the area and as such should consider and support the contribution that sites such as Arlington Works can play in regeneration. The immediate neighbourhood to the Arlington Works site is primarily residential in nature, and going forwards, planned development on the site needs to be mindful of this.
Alice Shackleton, on behalf of The Kew Society	- We would like to see a more concrete strategy for how the Council intends to insure that "Kew World Heritage Site will be protected and enhanced to conserve its outstanding universal value", particularly in light of the blocks under construction, applied for and envisaged in East Hounslow which would undoubtedly impact negatively on the OUV. Could "what you want" mean current important matters (such as shortage of affordable housing) might be used to override designation of protected open lands? These lands should, in our view, be held by the present owners as trustees for future generations. Once gone for current short-term needs and perceived needs, they are gone forever. - Notwithstanding the Urban Design Study 2021 proposals, we would like to see protection against inappropriate height (ie 7 storeys or more) and density of a potential redevelopment of Kew Retail Park, given current maximum heights in the adjacent Kew Riverside development are - with one exception - five storeys or less. Reactions to and changing work patterns as a result of the pandemic bring into question people's wish to live and increasingly work from home in such buildings.
Jon Burrell	The plan should not support the use of Twickenham Stadium to facilitate arms dealing as has happened in Jan 2022 with the International Armoured Vehicles Conference.
Hilary Pereira, River Thames Society	Most of these strategies have much that is sensible and appropriate in relation to the River Thames. However, the River Thames Society has commented adversely during the planning process on the detail of proposals in some areas, like Twickenham Riverside, and will continue to do so.
Bridget Fox, on behalf of the Woodland Trust	n/a
Joanna Childs	Although LBRUT is made up of lots of villages they don't exist in isolation and any future plans need to look at the borough as a whole. Or am I banned from Richmond town centre because it takes me more than 20 mins to walk there?
Max Millington	Speaking only in relation to Site Allocation 34 (Stag Brewery), I strongly disagree with the move from a local primary school to a large secondary school, and sixth form serving a large number of out-of-Borough pupils, that will have a materially negative impact on the local area, particularly when taken in context of other proposed land uses: the cumulative impact will not contribute to the new village heart for Mortlake, will not protect green open space, will not protect residents' lungs and will not reduce the risk presented by the level cossing. Mortlake is severely constrained and cannot house a secondary school of the size proposed. 6FE plus sixth form is not sustainable on this site. Further, there is no requirement for such a school that cannot be met by expansion of other schools. And, even if there were a requirement, this is not the optimal site - Barn Elms represents a better site overall when assessed alongside all potential sites across all relevant criteria - an exercsie with LBRuT have not undertaken. There should be due local consultation on this - noting that only 9% of respondents to the LBRuT planning applications supported Application B (secondary school) - there is vehament local opposition, for good reason. In any event, local parents do not wish to see a school of the type proposed by Livingstone Academy (the proposed provider, without local consultation). Section 14A of the Education Act 1996 (parent choice) has been entirely disregarded. Further, the impact of the proposed development - and other local schemes such as Homebase - on primary school provision has not been properly assessedand should be prioritiese, including the opportunity to move Thomson House school from its sub-optimal dual site position at present away from the level crossing onto a single site with its own enclosed recreation space. Otherwise, the objectives of the allocation are reasonable, but the application of those principles to recent planning appications falls short and cannot be disregarded in formulating the new Local Plan. For instane, the Local Plan references respecting the 2011 planning brief, but that has not been the case. The Local Plan references protecting natural green space, but that has not been the case (for instance, 2 natural grass playing fields will be replaced by concrete and a single plastic pitch. Please refer to detailed comments. [See comment in relation to the place-based strategy for Mortlake and see comment in relation to Site Allocation 34]
Tom Dunbar	I suggest that Twickenham Green currently has very poor access in the surrounding housing areas - with many schools and few amenities. I believe that green space and green infrastructure should be supported before plans to build are in place. The infrastructure isn't there and green spaces are highly sensitive to change.
Peter Willan and Paul Velluet, Old Deer Park Working Group	Our response here on the Place-based Strategy: Kew and on Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree. [See comment on the place-based strategy for Kew]
	<i>Note comments on place-based strategies and/or site-specific allocations (including for example in relation to Site Allocation 9: Teddington Police Station) have generally been collated in Table 6 below to group with other similar comments.</i>

Table 6: All responses received (to questions 9/10/11 on the [response form](#)) in relation to general comments on the Local Plan (detailed policies etc) (as received, in Plan order) and the Council's response

Full Name	Part of plan commenting on	Detailed Comments
Theresa Oddelm, The Royal Parks	General comments (in relation to Royal Parks)	<p>The Royal Parks is grateful for the opportunity to comment on the above proposals at this stage in the process.</p> <p>Planning Overview</p> <p>The Royal Parks acknowledges the inclusion of reference to the importance of Richmond Park and Bushy Park within the London Borough of Richmond upon Thames as set out within the Pre-Publication Draft Local Plan.</p> <p>We note that the Royal Parks are highlighted within the document text in respect of: area context, place-based strategies, promoting jobs and local economy, views and vistas, green and blue infrastructure network, public open space, and biodiversity designations. The importance of the Parks in the context of these topic areas aligns with The Royal Parks' own objectives.</p> <p>In addition to references in the supporting text, the Pre-Publication Draft Local Plan makes specific reference to The Royal Parks within a number of policies. Whilst this is acknowledged, we would like the London Borough of Richmond upon Thames to go further by including a stand-alone Royal Parks policy. We consider that the importance of the Parks - as demonstrated by relevant reference to them throughout the Draft Local Plan - would justify such an inclusion and The Royal Parks would be keen to work with the Council to achieve this.</p> <p>The Royal Parks would also like to work with the Council to capture the value of development around the Parks, and for support in protecting, maintaining and enhancing these sites of key green infrastructure which represent a significant asset to the Borough. Both dense development directly on our Park boundaries and taller developments that impact on the sightline are potentially detrimental to these listed landscapes and intrusive to our visitors. We would therefore like to see the Local Plan tie in with our own developing policy documents.</p> <p>[See other comments in relation to draft policies and comments specific to biodiversity and the Royal Parks' Environmental Designations]</p> <p>Conclusions and Proposals</p> <p>We are pleased to see the quality of the policies put forward which align with many objectives of The Royal Parks.</p> <p>We would however like to work with the Council to achieve more policy support for The Royal Parks, both in terms of its protection from development beyond the Park boundaries, and in terms of The Royal Parks' own activities and objectives to maintain, protect and enhance these important assets and provide for the increasing number of visitors to them.</p>

		<p>In addition to the policy-by-policy comments provided above, we would like to suggest the following actions in respect of the development of this Local Plan:</p> <p>A stand-alone Royal Parks policy: Bushy and Richmond Parks account for most of the green space in the Borough and deliver significant environmental and amenity benefits for local residents. The Royal Parks are key features and assets in the London Borough of Richmond upon Thames. It would therefore be proportionate for a specific Royal Parks policy to be included within the Local Plan. This could be similar to draft Policy 32 (Royal Botanic Gardens, Kew World Heritage Site). A specific Royal Parks policy in the Local Plan could refer to the Royal Parks Management Plan. It could then be referred to and cross-referenced within other key relevant policies, for example similarly to how draft Policy 45 refers to Policy 32 (note there is a typo which refers to the policy as Policy 29 rather than Policy 32). We believe the objectives of the Council and The Royal Parks are aligned and we are keen to engage with the Council in the drafting a stand-alone policy which would have the benefit of giving the Parks the protection and support which they require over the Plan period.</p> <p><u>Capturing value of development to support The Royal Parks:</u></p> <p>The Royal Parks are a key part of green and open space infrastructure in the Borough, in terms of both the quality they provide and the sheer scale of space they provide. Development in the Borough, particularly new residential development, benefits significantly from what the Royal Parks provide but also significantly increases the pressure upon them, through increase and intensification of visitor numbers. The Royal Parks would therefore like to work with the Council to capture the value of relevant development to support The Royal Parks in our work to protect, maintain and enhance the Parks, potentially through S106/CIL contributions over the next Plan period.</p> <p>As we review and refresh existing policies and develop new initiatives in respect of development within the Parks, we will engage with the Council and other key stakeholders at appropriate times and take into account the new Local Plan for the Borough.</p>
Katie Parsons, Historic England	General comments (in relation to historic environment)	<p>As the Government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on the draft document.</p> <p>We have provided some more detailed comments in appendix 1 below [see comments in this schedule], but in summary the plan represents the historic environment well and considers it consistently and appropriately throughout. Our main concerns relate to the detail associated with site allocations. There are some areas however where the plan can be improved to ensure the historic environment is conserved and managed sustainability.</p> <ul style="list-style-type: none">• We note that the plan allocations do not assign densities, quantum of development etc. This may be due to the early stage of the plan, but it would be helpful to have clarification on this point. It is important that sites with heritage sensitivities are carefully considered to ensure the extent of development anticipated can be accommodated sustainably. We have focused our comments on key sites being put forward for allocation.• In general, the findings from the Urban Design Study (2021) could be better transposed into policy objectives, particularly within the site allocation policies. It is appreciated that further design work will be carried out e.g. masterplans, SPDs etc. for some of the sites, but where specific findings have already been drawn in the evidence there is scope to reflect key points within the plan policies at this stage. The future development of guidance leaves a gap between adoption of the plan and its production, the risks posed by this would be minimised by providing further detail and development requirements within the policies. This is an important part of demonstrating a positive strategy for the conservation of the historic environment as set out in the NPPF. Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. <p>Detailed comments</p> <p>The plan provides a strong basis for the conservation and enhancement of the historic environment. We welcome the attention paid to climate change, the focus on a design-led approach to site capacity, as well as standalone policies on non-designated assets, views, shopfronts, and regular reference to the Urban Design Study. Generally, please take the absence of comments on policies as them being acceptable. We have some comments on the following aspects of the plan however. [see comments in this schedule]</p>
Tim Catchpole, Mortlake with East Sheen Society	General comments (in relation to structure of plan)	<p>We note that this draft update of the Local Plan (referred to hereafter as the Update Plan) launches almost immediately into the spatial strategy for the nine distinct areas of the Borough and then covers the Borough-wide policies, whereas the current Local Plan adopted in 2018 sets out the Borough-wide policies first leading to the spatial strategy at the end. We wonder why there has been this change of approach?</p> <p>The ‘batting order’ of the Borough-wide policies rightly starts with policies on climate change, energy, flood-risk and water infrastructure and then follows with housing, town centres, local character and design quality, green and blue infrastructure, sustainable travel and the social and community infrastructure. This is a sensible batting order but we fail to understand why the document then concludes with the design process, tall buildings, local environmental impacts and basements – they seem to have been tagged on at the last minute like after-thoughts whereas they should surely belong to the section on local character and design quality, as indeed they do in the current Local Plan.</p> <p>The plans in the spatial strategy sections need to be clearer and the ‘ratings polygon diagrams’ from the Urban Design Study consultation of 2021 are poorly presented in an almost illegible series of images. The data would be better presented as tables as the polygons are virtually meaningless to most people who are not academic specialists.</p> <p>In our comments we have found the text in your supporting document – A Summary of the place-based strategies with site allocations and policies (Dec 2021) – very useful as “it sets out some of the main changes when compared with the adopted Local Plan.”.</p>
Hannah Bridges, Spelthorne Borough Council	General comments (in relation to Site Allocations and Spelthorne Local Plan)	<p><u>Allocations</u></p> <p>We note there are no sites proposed in the Site Allocations document in close proximity to the boundary of the two authorities.</p> <p><u>Spelthorne Local Plan</u></p> <p>Spelthorne BC plans to consult on its Draft Local Plan (Regulation 19) in late Spring 2022 therefore we welcome further engagement on this and strategic matters moving forward. Spelthorne Borough Council looks forward to continuing its engagement with LB Richmond upon Thames through the Local Plan process. Officers in the Strategic Planning team are available to discuss any of the comments above should this be useful.</p> <p>Please note that this response is at officer level and as such, Spelthorne Borough Council reserves the right to raise any further issues during the preparation of the LB Richmond Local Plan if Members of the Council wish to do so.</p> <p>[See comment on housing].</p>
Shahina Inayathusein, TfL Location Enquiries	General comments (in relation to London Underground Infrastructure Protection)	<p>We have no comments to make at this stage except that London Underground Infrastructure Protection needs to be consulted as Statutory Consultees on any planning application within London Underground zone of interest as per TOWN AND COUNTRY PLANNING, ENGLAND-The Town and Country Planning (Development Management Procedure) (England) Order 2015 issued on 16th April 2015.</p> <p>Also, where there are intended works in the Highway we would need to be notified of these so that we can ensure there is no damage to them.</p> <p><i>This response is made as Railway Infrastructure Manager under the “Town and Country Planning (Development Management Procedure) Order 2015”. It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.</i></p>
George Goodby, Environment Agency	General comments (in relation to EA position and Duty to Cooperate)	<p>Environment Agency Position</p>

		<p>Our aim is to assist you prepare and implement a sound, robust, and effective plan that is reflective of national policy and your local evidence base. We hope that this collaborative process leads to a plan that delivers sustainable development, contributes to a stronger economy, and safeguards the environment for future generations.</p> <p>Our detailed comments are provided below, following the general order of the topics presented in the draft local plan document. Where we wish to see policies strengthened we have outlined the additional content we would like included. We have also referenced the relevant sections and policy numbers for ease of navigating our response.</p> <p>We support your strategic objectives to ensure London Borough of Richmond has a sustainable future:</p> <ul style="list-style-type: none">• Responding to the climate emergency and taking action• Increasing biodiversity and the quality of our green and blue spaces, and greening the borough• Reducing the need to travel and improving the choices for more sustainable travel <p>We have provided detailed comments in Section 1 on the key environmental issues and opportunities within the Local Plan. Section 2 contains our comments on the individual proposed site allocations for development. Within Section 3 we have provided comments on our review of the Sustainability Appraisal and Sequential Test report. [See other comments in this schedule]</p> <p>Duty to Co-operate</p> <p>Most natural resources extend across multiple Local Authority areas. We encourage the Council to make full use of the Duty to Co-operate when revising this draft local plan. Cross-boundary, collaborative working will ensure that strategic priorities across local boundaries are properly co-ordinated. Please consider this when addressing climate change, flood risk, waste management, habitat and biodiversity enhancement, watercourse protection and improvement, water and waste resources.</p> <p>Final comments</p> <p>Once again, thank you for contacting us, we hope that our comments are useful. We would welcome the opportunity to work with you to address our concerns so that prior to the Regulation 19 consultation, you may produce a robust, effective and justified plan that is reflective of national planning policy and your local evidence base.</p>
Nina Miles, GLA on behalf of Mayor of London	General comments	<p>As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) has provided comments, which I endorse, and are attached at Annex 1. [See comments under Richard Carr, Transport for London (TfL) in this schedule]</p> <p>The London Plan</p> <p>This letter provides advice and sets out issues or approaches you should consider as the new London Borough of Richmond upon Thames Local Plan develops so that the final draft Local Plan is consistent with the London Plan 2021 (LP2021). The London Plan 2021 was formally published on the 2 March 2021, and now forms part of LB Richmond upon Thames’ Development Plan.</p> <p>General</p> <p>The Mayor recognises that Richmond’s Local Plan consultation is now at the pre-publication stage of the borough’s Local Plan preparation and that it has been informed by a Direction of Travel public consultation which was undertaken in Spring 2020. It sets out the strategic vision, objectives and spatial strategy, with place-based strategies and thematic policies and guidance to manage growth and guide development across the borough.</p> <p>This letter provides an opportunity also to draw your attention to the Mayor’s pandemic recovery missions. There are nine missions in total, including high streets for all, enabling resilient communities and digital access for all, which may be useful in helping to develop the spatial strategy for Richmond further.</p> <p>The Regulation 18 Local Plan sets a clear plan for growth and addresses many important policy areas such as responding to climate change and delivering new homes through incremental intensification in well-connected locations. However, the current approach to affordable housing in Policy 11 is likely to be an issue of general conformity and further detail on this is provided below.</p>
Natural England	General comments	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on this consultation.</p> <p>[See comment following Duty to Cooperate email]</p>
K Peachey	Whole plan	<p>I congratulate you on what looks like a very progressive plan at first glance. I would have liked more time to read and comment before the deadline but must focus on a couple of areas for the time I have.</p>
Wendy Micklewright	General comment	<p>Hope you are good + thank you for all you do</p> <p>Mental illness is a lie - which causes untold suffering + distress</p> <p>Please see our website + UTUBE detailed below ...</p> <p>Please include this in your work</p> <p>Emotional CPR: Heart-Centered Peer Support Website – Emotional CPR</p> <p>I do not attend online meetings generally - in solidarity - with many people I know who are digitally excluded for many reasons ...</p> <p>I am not a big fan of surveys - ask certain questions get certain answers</p> <p>When are people going to listen to us - not paid researchers ?</p> <p>The problem is poverty - not individuals being "gaslighted" into thinking they are mentally ill ..</p> <p>I think it is important to stress hearing voices is not an illness ...</p> <p>I understand the conflict between working in the system + challenging the system - it is however important to stress if people do not want the drugs they should be supported to come off the drugs ...</p> <p>This information maybe useful to you ?</p> <p>Sedated, How Modern Capitalism Created our Mental Health Crisis - James Davies + Combatting Structural Racism and Classism in Psychiatry: An Interview with Helena Hansen</p> <p>How Western Psychology Can Rip Indigenous Families Apart: An Interview with Elisa Lacerda-Vandenborn</p> <p>Suman Fernando’s book Institutional racism in psychiatry + clinical psychology</p> <p>Whiteness as a chemical restraint in statutory guidance of the Mental Health units (Use of Force) Act 2018 – a tribute to Seni’s law + Aijibola Lewis</p> <p>Blog by Colin King via NSUN</p> <p>A straight-talking introduction to Psychiatric drugs – the truth about how they work + how to come off them – Joanna Moncrieff</p> <p>People deprived of liberty due to misapplication of Mental Health + Capacity Acts</p> <p>Half of people with a learning disability and autistic people reluctant to provide feedback on care</p> <p>Women disproportionately affected by soaring Mental Health Act detentions</p> <p>Report Finds Monitoring of Electroshock Treatment Unsafe</p>

		<p>New Study Finds ECT Ineffective for Reducing Suicide Risk Repeal provisions for Community Treatment Order Provide Tapering Strips for People Who Want to Withdraw Safely from Psychotropic Drugs Petition by James Moore Tapering strips Long-term antipsychotic use linked to breast cancer NICE revises antidepressant guidance to warn of 'severe' withdrawal symptoms Coronavirus and depression in adults, Great Britain: January to March 2021 ONS “Almost 4 in 10 adults earning less than £10,000 a year experienced depressive symptom compared with around 1 in 10 earning £50,000 or more” The data shows what we know to be true: struggling with your mental health doesn’t happen in a vacuum. Why not Diagnose Social Conditions Instead of Individual Symptoms? The WHO Calls for Radical Change in Global Mental Health Our work is cited as best practise by the WHO ... FOR INFORMATION To quote Andy Burnham ... If we wait for the "powers that be" we will wait forever? so best if we just do it ourselves?</p> <table><tr><td>Citizen control</td><td rowspan="3">Degree of citizen power</td></tr><tr><td>Delegated power</td></tr><tr><td>Partnership</td></tr><tr><td>Placation</td><td rowspan="3">Degree of tokenism</td></tr><tr><td>Consultation</td></tr><tr><td>Informing</td></tr><tr><td>Therapy</td><td rowspan="2">Non participation</td></tr><tr><td>manipulation</td></tr><tr><td>Old power</td><td>New power</td></tr><tr><td>Currency</td><td>Current</td></tr><tr><td>Held by few</td><td>Made by many</td></tr><tr><td>Pushed down</td><td>Pulled in</td></tr><tr><td>Commanded</td><td>Shared</td></tr><tr><td>Closed</td><td>Open</td></tr><tr><td>transaction</td><td>relationships</td></tr></table>	Citizen control	Degree of citizen power	Delegated power	Partnership	Placation	Degree of tokenism	Consultation	Informing	Therapy	Non participation	manipulation	Old power	New power	Currency	Current	Held by few	Made by many	Pushed down	Pulled in	Commanded	Shared	Closed	Open	transaction	relationships
Citizen control	Degree of citizen power																										
Delegated power																											
Partnership																											
Placation	Degree of tokenism																										
Consultation																											
Informing																											
Therapy	Non participation																										
manipulation																											
Old power	New power																										
Currency	Current																										
Held by few	Made by many																										
Pushed down	Pulled in																										
Commanded	Shared																										
Closed	Open																										
transaction	relationships																										
John Waxman, Crane Valley Partnership	General and in relation to river corridors	<p>I am submitting this consultation response in my capacity as the Crane Valley Partnership's Development Manager. The Crane Valley Partnership (CVP) is an unincorporated association of public, private and third sector organisations that aims to:</p> <ul style="list-style-type: none">• raise awareness and support action for conservation, restoration and new approaches to design and management of the river valley• help communities take a sustainable approach to managing and improving the River Crane and its tributaries• improve and protect the biodiversity of the area• maximise the use of the river corridor as a resource for healthier living and educational activities for local people• promote connectivity along the river corridor <p>CVP is hosted by the Crane Valley Community Interest Company and is the formally recognised Catchment Based Approach (CaBA) partnership for the Crane catchment. CVP is also a member of the GLA's ‘Catchment Partnerships in London’ Forum.</p> <p>For more information on CVP please see: www.cranevalley.org.uk</p> <p>Please note that LB of Richmond upon Thames is itself a member of CVP. I should also highlight that my response does not present the collective view of the various partner organisations within CVP. Members of CVP will have their own perspectives on the draft Local Plan and will submit their own responses accordingly if they wish to engage in the consultation process.</p> <p>I have read the detailed formal response to this consultation produced by Friends Of the River Crane Environment (FORCE). FORCE is a member of CVP and as you are no doubt aware, this community-based organisation has considerable local knowledge and an impressive track record in terms of environmental stewardship activity. There is nothing in FORCE’s response that I disagree with - indeed it provides an excellent commentary and I fully endorse all the comments therein. I would urge the Local Authority to take note of FORCE’s response and act on the specific issues raised to assist the process of refining the Local Plan in relation to the protection and enhancement of the Borough’s river corridors and associated open spaces. Given FORCE’s credentials I would suggest that this organisation’s views should carry considerable weight within this consultation.</p> <p>I would like to take this opportunity to reinforce FORCE’s comment that the Local Plan should be informed by the <i>Colne and Crane Valleys Green Infrastructure Strategy</i>, produced in 2019, which identifies a range of river corridor enhancement and active travel opportunities in the Borough. This document can be found at: https:// www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/ . River Corridors - and indeed the many people who utilise them for travel and recreation - cross borough boundaries, so a coordinated pan-borough approach to green infrastructure provision is required. LBRuT’s Local Plan should clearly acknowledge this.</p> <p>I would highlight that CVP has (through the Smarter Water Catchments initiative) commissioned Sustrans to undertake a footpath and cycleway audit along the river corridors of the Crane Valley. This report will be ready soon and it would be beneficial to feed the findings into the Local Plan consultation process.</p>																									

Hannah Gray, Avison Young on behalf of National Grid	General in relation to National Grid and energy infrastructure assets	<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK’s four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid’s core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>National Grid assets within the Plan area</p> <p>Following a review of the above Development Plan Document, we have identified one or more National Grid assets within the Plan area.</p> <p>Details of National Grid assets are provided below.</p> <p><i>Electricity Transmission</i></p> <div><div>Asset Description</div><div>275Kv Underground Cable route: EALING - LALEHAM 1</div></div> <p>A plan showing details and locations of National Grid’s assets is attached to this letter. Please note that this plan is illustrative only.</p> <p>Please also see attached information outlining further guidance on development close to National Grid assets.</p> <p>Further Advice</p> <p>National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets.</p> <p>[See Appendix 1 for further guidance and plan]</p>
Lucinda Robinson, Marine Management Organisation (MMO)	General in relation to marine planning and marine licensing	<p>MMO Marine Planning and Marine Licensing response to Richmond Local plan</p> <p>Thank you for giving us the opportunity to comment on the local Plan. The comments provided within this letter refer to the document entitled Richmond local plan As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO’s licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the South East Marine Plan is of relevance. The plan was published for public consultation on 14th January 2020, at which point it became material for consideration. The South East Marine Plan was adopted June 2021, alongside the North East, North West, and South West. The South East Marine Plans cover the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area.</p> <p>All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the South East Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance, Explore Marine Plans and the Planning Advisory Service soundness self-assessment checklist.</p> <p>Marine Licensing</p> <p>The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area.</p> <p>The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters.</p> <p>The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.</p> <p>Summary notes</p> <p>Please see below suggested policies from the South East Inshore Marine Plans that we feel are most relevant to your neighbourhood plan. These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East Marine Plans is completed:</p> <p>·SE-INF-1:</p> <p>Proposals for appropriate marine infrastructure which facilitates land-based activities, or land-based infrastructure which facilitates marine activities (including the diversification or regeneration of sustainable marine industries), should be supported.</p> <p>·SE-INF-2:</p> <p>(1) Proposals for alternative development at existing safeguarded landing facilities will not be supported.</p> <p>(2) Proposals adjacent and opposite existing safeguarded landing facilities must demonstrate that they avoid significant adverse impacts on existing safeguarded landing facilities.</p> <p>(3) Proposals for alternative development at existing landing facilities (excluding safeguarded sites) should not be supported unless that facility is no longer viable or capable of being made viable for waterborne transport.</p> <p>(4) Proposals adjacent and opposite existing landing facilities (excluding safeguarded sites) that may have significant adverse impacts on the landing facilities should demonstrate that they will, in order of preference:</p> <p>a) avoid</p> <p>b) minimise</p> <p>c) mitigate - adverse impacts so they are no longer significant.</p> <p>·SE-HER-1:</p> <p>Proposals that demonstrate they will conserve and enhance the significance of heritage assets will be supported.</p> <p>Where proposals may cause harm to the significance of heritage assets, proponents must demonstrate that they will, in order of preference:</p> <p>a) avoid</p>

		<p>b) minimise c) mitigate - any harm to the significance of heritage assets. If it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets.</p> <p>·SE-SCP-1: Proposals should ensure they are compatible with their surroundings and should not have a significant adverse impact on the character and visual resource of the seascape and landscape of the area. The location, scale and design of proposals should take account of the character, quality and distinctiveness of the seascape and landscape. Proposals that may have significant adverse impacts on the seascape and landscape of the area should demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant. If it is not possible to mitigate, the public benefits for proceeding with the proposal must outweigh significant adverse impacts to the seascape and landscape of the area. Proposals within or relatively close to nationally designated areas should have regard to the specific statutory purposes of the designated area. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty.</p> <p>·SE-EMP-1: Proposals that result in a net increase in marine-related employment will be supported, particularly where they meet one or more of the following: 1) are aligned with local skills strategies and support the skills available 2) create a diversity of opportunities 3) create employment in locations identified as the most deprived 4) implement new technologies - in, and adjacent to, the south east marine plan area.</p> <p>·SE-CC-1: Proposals that conserve, restore or enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant d) compensate for significant adverse impacts that cannot be mitigated</p> <p>·SE-CC-2: Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change.</p> <p>·SE-CC-3: Proposals in the south east marine plan area, and adjacent marine plan areas, that are likely to have significant adverse impacts on coastal change, or on climate change adaptation measures inside and outside of the proposed project areas, should only be supported if they can demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant.</p> <p>·SE-AIR-1: Proposals must assess their direct and indirect impacts upon local air quality and emissions of greenhouse gases. Proposals that are likely to result in increased air pollution or increased emissions of greenhouse gases must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - air pollution and/or greenhouse gas emissions in line with current national and local air quality objectives and legal requirements.</p> <p>·SE-ACC-1: Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, including the provision of services for tourism and recreation activities, will be supported. Proposals that may have significant adverse impacts on public access should demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant.</p> <p>·SE-TR-1: Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported. Proposals that may have significant adverse impacts on tourism and recreation activities must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant.</p> <p>·SE-BIO-1: Proposals that enhance the distribution of priority habitats and priority species will be supported.</p>
--	--	--

		<p>Proposals that may have significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference:</p> <p>a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant d) compensate for significant adverse impacts that cannot be mitigated.</p> <p>-SE-BIO-2: Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration, will be supported.</p> <p>Proposals that may cause significant adverse impacts on native species or habitat adaptation or connectivity, or native species migration, must demonstrate that they will, in order of preference:</p> <p>a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant d) compensate for significant adverse impacts that cannot be mitigated</p> <p>-SE-BIO-3: Proposals that conserve, restore or enhance coastal habitats, where important in their own right and/or for ecosystem functioning and provision of ecosystem services, will be supported.</p> <p>Proposals must take account of the space required for coastal habitats, where important in their own right and/or for ecosystem functioning and provision of ecosystem services, and demonstrate that they will, in order of preference:</p> <p>a) avoid b) minimise c) mitigate d) compensate for - net habitat loss.</p> <p>[See also comment in relation to paragraph 21.88]</p>
Peter Willan and Paul Velluet, Old Deer Park Working Group	General (in relation to title of the Plan, page numbers)	Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. Needs remedying. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. Needs remedying. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. Needs remedying.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General (in relation to title of the Plan, page numbers)	Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. Needs remedying. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. Needs remedying. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. Needs remedying.
	Introduction	
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to Policies Map)	Neither Section 2 nor Section 15 appears to included any reference to a Policies Map. Referring to the note contained under ‘Policies Map for the Local Plan Review, 2015-2018’ in the part of the Council’s current Planning Policy web-site dealing with the current ‘Adopted Local Plan’ (adopted in July, 2018), it is clearly stated that ‘The Council’s Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020’. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.
Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to Policies Map)	Neither Section 2 nor Section 15 appears to include any reference to a Policies Map. Referring to the note contained under ‘Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that ‘The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.
Alec Lever, Richmond Labour Party	General comment (in relation to the preamble)	Our concern is that its delivery requires interventionist action by the Council which will not happen. Experience has shown, as quoted evidence throughout the document attests, that the ideological reliance, shared by Conservative and Liberal Democrat politicians, on the free market's ability to provide will fail again. We find a complacency in the relative prosperity of the Borough pervades the preamble. All working residents, across all income deciles, are not receiving rewards commensurate to their contribution to national wealth creation. Thriving local businesses need customers with more disposable income. While a fairer sharing of income and wealth requires the 'No more business as usual' change to a Labour Government nationally, Local Government can plan to play its part as the repeated wins of the LGC UK Council of the Year by Labour controlled Councils show, e.g. Hounslow, Barking, Wigan, Brent.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to evidence base)	So much in the Draft Local Plan derives from questionable analysis and questionable recommendations in Arup’s Urban Design Study and, in more limited part, this in Arup’s 156-page Metropolitan Open Land Review Annexe Report. Indeed, all these need to firmly challenged.
Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to evidence base)	So much in the Draft Local Plan derives from questionable analysis and recommendations in Arup's Urban Design Study and, in more limited part, this in Arup's 156-page Metropolitan Open Land Review Annexe Report. Indeed, all these need to firmly challenged.
Katie Parsons, Historic England	Sustainability Appraisal (SA) Scoping	As you will be aware, under the provisions of Article 5(1) of The SEA Directive there is a requirement to assess the likely significant effects which the Policies and proposals of a Plan might have upon “cultural heritage including architectural and archaeological heritage”. In terms of the historic environment, whilst we would many aspects of the Appraisal, we have the following comments to make: Plans, Policies, and Programmes: There are a number of other relevant plans and programmes that should be included: • UNESCO World Heritage Convention

		<ul style="list-style-type: none">• European Landscape Convention• The European Convention on the Protection of Archaeological Heritage• Convention for the Protection of the Architectural Heritage of Europe• Planning (Listed Buildings & Conservation Areas) Act 1990• Ancient Monuments & Archaeological Areas Act 1979• The Royal Botanic Gardens Kew World Heritage Site Management Plan• The local level is also important in setting the appropriate context for the scoping report, which could helpfully draw on Richmond’s existing characterisations studies, local lists, Building of Townscape Merit SPD, Conservation Area Appraisals etc. Aspects of the emerging plan have the potential to impact upon the wider historic environment across administrative boundaries. It may be necessary to use local documents from neighbouring boroughs as part of the SA’s baseline evidence where relevant. <p>Method for Generation of Alternatives - The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base.</p>
Siriol Davies, Ham and Petersham Neighbourhood Forum	Sustainability Appraisal p.4	1) include reference to construction waste (63% of all landfill) and reducing embodied energy. Reference ciruclar economy. 4) 82% of buildings built today will be here in 2050. need to meet net zero now to avoid need for retro-fit prior to 2050. Include reference to reducing greenhouse gas emissions in retro-fits and refurbishments (not just new developments).
Natural England	Sustainability Appraisal and Habitats Regulation Assessment (in relation to Duty to Cooperate)	Thank you for the detailed update on the progress of the Draft Local Plan including noting our previous responses, and for drawing our attention to the draft Sustainability Appraisal and Habitats Regulation Assessment. Having considered the HRA, we are broadly in agreement with the conclusions. We would support the strengthening of Policy 37 to encourage visitors towards greenspaces outside of those which are Habitat Sites, and recognise the need for further traffic modelling to be able to inform the impacts of the plan in terms of air quality. We would be happy to be reconsulted on the HRA once this modelling has been completed to assess whether we agree with the conclusions, and whether adverse air quality impacts on a Habitat Site can be ruled out or whether there is a need for mitigation.
Theresa Oddelm, The Royal Parks	Habitat Regulations Assessment (LUC, 2021)	<u>Screening Assessment, Noise, vibration and light pollution, Richmond Park SAC (page 49)</u> The report states that ‘ <i>artificial lighting at night (eg. from street lamps, flood lighting and security lights) is most likely to affect bat populations and some nocturnal bird species</i> ’. There is therefore no consideration of the potential impact on invertebrates such as stag beetle, which may alter their behaviour (including mating activity) or be more vulnerable to predation as a result of artificial lighting. This potential impact on the Richmond Park SAC should be considered. <u>Screening Assessment, Air Pollution, Richmond Park SAC (page 56)</u> There is no consideration of through traffic within Richmond Park SAC and the potential for associated air pollution to impact stag beetles, either through impacts on trees and particularly veteran trees, or on soil chemistry (stag beetle larvae developing beneath ground). Nor is there consideration of the impact which local developments or transport policies may have on levels of traffic through the Park. <u>Screening Assessment, Recreation, Richmond Park SAC (page 58)</u> Recreation impacts on Richmond Park SAC are discounted solely on the basis of site management. However, as per the discussion for Wimbledon Common (which is screened in for further assessment partly on the basis of its draw to visitors), Richmond Park is subject to extremely high visitor numbers and would likely be impacted by increased development in the Borough to a greater degree given location and accessibility. Visitor pressure is at such a high level that even with extensive resources allocated to tree and deadwood management the tree population - including veteran trees - suffer from compaction and erosion, vandalism and fire (for example), whilst deadwood habitats are subject to significant disturbance by visitors. It is therefore <u>not</u> considered appropriate to screen the site out from further assessment as a result of recreational pressure and for the incorporation of mitigation within the Local Plan.
George Goodby, Environment Agency	Sequential Test Report & Level 2 SFRA	We welcome that the Sequential Test Report by Metis has been completed to support the Site Allocations. We look forward to working with you and/or reviewing the Level 2 SFRA which will also support the Site Allocations. Please refer to section 8.2 of your Level 1 SFRA (dated March 2021) for further information on the Level 2 SFRA.
George Goodby, Environment Agency	Sustainability Appraisal and Sequential Test Report	<p>The Sustainability Appraisal (SA) states that the assessments of the Local Plan objectives show that they have a largely positive effect when compared to the SA Framework. It goes on to state that no noteworthy policy gaps were identified, and no significant negative effects were established that required mitigation. There are, however, instances where there are uncertainties or potential tensions amongst objectives. One of the key areas where this arose is the impacts on heritage and the natural environment. Whilst it goes on to state that due to the large areas of protected open land and historic settlements in the borough it may limit opportunities for development. We would also advise that in addition to protected open land and historic settlements, other natural environmental features such as river corridors and areas of high flood risk may also limit where development can be sustainably delivered.</p> <p>The Local Plan’s draft policies were tested against the selected sustainability objectives outlined within the table on page 8. We feel the SA objectives are appropriately selected and represent the key environmental issues and opportunities across the London Borough of Richmond. However, we wish to comment on specific SA objectives and policies within the draft Local Plan to highlight where further opportunities are missed or where the significance/magnitude of the effects have not been accurately predicted.</p> <p>SA Objective: Adapt to the effect of climate change</p> <p>The SA summarises that the draft policy framework ‘Delivering new homes and an affordable borough for all’ would have a neutral or uncertain effect on the SA objective ‘Adapt to the effect of climate change’ This SA objective refers to adapting to the effects of a changing climate by protecting and managing water resources and avoiding or reducing flood risk from all sources. We would disagree with the conclusion that it has both a neutral or uncertain effect on this objective. The draft list allocated sites has designated a number of potential sites within Flood Zone 2 or 3. In addition, new development in ‘town centres and local centres’ may potentially not be required to apply the Sequential Test, thus potentially delivering a significant number of new homes in areas of high flood risk. We would refer to the current Strategic Flood Risk Assessment with regards to identifying the known effect of the proposed policies against this SA objective. The SFRA provides a robust evidence base to identify areas of the borough at risk of flooding and therefore can inform what risk any potential development may face and cause.</p> <p>In addition, section 4.3 Local and Town Centres states: <i>‘There are five designated town centres and seven local centres in the borough. They are listed, along with further information, in Section 6.2 in the SFRA. The local Sequential Test approach dictates that the Sequential Test or Exception Test will not be required if the development proposal meets at least one of the following:</i></p> <ul style="list-style-type: none">• <i>It is within a town centre or local centre boundary.</i>• <i>It is for residential development or a mixed-use scheme and within the 800m buffer area identified within the town centre or local centre (This was not included in the Screening Assessment to ensure that all sites at high risk were properly assessed)’</i> <p>Firstly, we would request confirmation that potential proposed developments within these designated areas are required to pass the Exception Test in line with the requirements of with Table 3: Flood risk vulnerability and flood zone ‘compatibility’ of the National PPG. For example, any proposed residential development within Flood Zone 3a is required to pass the Exception Test unless a change of use application. It would appear that certain types of development would not be required to pass the Exception Test under the draft Local Plan thus this local Sequential Test approach</p>

		<p>would be contrary to the NPPF. We seek clarification that the proposed sites that have been deemed not to require the Exception Test as outlined in Table 3-1 of the Flood Risk and Development Sequential Test report are exempt in accordance with Table 3 of the NPPG.</p> <p>In addition, policy framework ‘<i>Shaping and supporting town / local centres as they adapt and respond to the pandemic</i>’ is deemed not to be applicable to this particular SA objective. Given the potential flood risk in town centres and local centres, where factoring in the 800m, they all have some degree of Flood Zone 3a including an allowance for climate change as identified in the SFRA. Therefore, we would recommend that this policy framework is tested against this SA objective.</p> <p>Increasing biodiversity and the quality of our green and blue spaces, and greening the borough is concluded as having a very positive effect on this SA objective. Overall, we agree with this conclusion that it will have a very positive effect. Within policies Policy 34. Green and Blue Infrastructure and Policy 39. Biodiversity and Geodiversity we welcome the borough’s approach to protect and enhance the borough’s biodiversity and blue and green corridors</p> <p><i>Additional comments – Sequential Test Report</i></p> <p>Paragraph 1.1.1 only refers to the London Borough of Richmond being subject to fluvial and tidal flooding from the River Thames. We would recommend this section also references the fact that it is at risk of fluvial flooding from other tributaries of the River Thames as well e.g. River Crane and the Beverley Brook.</p> <p>We support paragraph 4.2.1 regarding islands and flood risk. We would recommend you consider our comments above [see other comment] titled ‘<i>Paragraph 16.63 – Islands and functional floodplain designations</i>’ of the Draft Local Plan to refine this wording in the Sequential Test Report as well.</p> <p>Reduce pollution, minimise impacts of development</p> <p>This SA objective which states ‘To reduce pollution (such as air, noise, light, water and soil), improve air quality and minimise impacts associated with developments.’ is deemed to have a very positive effect on the following policy framework ‘Increasing biodiversity and the quality of our green and blue spaces, and greening the borough’. We welcome the inclusion of this objective and agree that the Local Plan will have a very positive effect on this borough’s biodiversity and green and blue spaces.</p> <p>In addition, the SA states that there is a very positive effect from ‘Responding to the climate emergency and taking action’ policy framework. Again, we agree with this assessment. We welcome the inclusion of policies 3, 7 & 9 which address potential pollution and other negative environment impacts which may cause both land and water pollution.</p> <p>We agree with this conclusion, however, feel that there is opportunity for the policy framework to provide a much greater positive effect.</p> <p>SA evidence base</p> <p>We welcome the updated Draft Revised Sustainability Appraisal Scoping which includes the strategies and plans we highlighted in our last consultation responses such as TE2100 plan and the Governments 25 year environment plan.</p> <p>The SEA/SA section requires updating to ensure the emerging local plan policies and site allocations are based on an accurate and sound evidence base.</p> <p>We recommend the following plans and strategies are added to the SEA/SA process and demonstrate how they have been considered to inform the development of the new Merton local plan.</p> <p>EA2025 action plan</p> <p>https://www.gov.uk/government/publications/environment-agency-ea2025-creating-a-better-place</p> <p>This plan, EA2025, translates our vision for the future into action. We will protect and enhance the environment as a whole and contribute to sustainable development. Through this we will contribute to the United Nations Sustainable Development Goals and help protect the nation’s security in the face of emergencies. The plan sets out 3 long term goals:</p> <ul style="list-style-type: none">• a nation resilient to climate change• healthy air, land and water• green growth and a sustainable future <p>These goals will drive everything we do today, tomorrow and to 2025. They champion sustainable development, support our work to create better places and challenge us to tackle the climate emergency and deliver a green economic recovery for everyone.</p> <p>National Flood and Coastal Erosion Risk Management Strategy for England (2020) https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2</p> <p>The Strategy has three core ambitions concerning future risk and investment needs:</p> <ol style="list-style-type: none">1. Climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change2. Today’s growth and infrastructure resilient in tomorrow’s climate: Making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as resilient infrastructure.3. A nation ready to respond and adapt to flooding and coastal change: Ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action. <p>The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 https://www.legislation.gov.uk/ukxi/2017/407/contents/made</p> <p>https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality</p> <p>Resources and waste strategy for England (December 2018)</p> <p>https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england</p> <p>Serious and organised crime: 2018 review - The final report includes recommendations for a strategic approach to serious and organised waste crime.</p> <p>https://www.gov.uk/government/publications/serious-and-organised-waste-crime-2018-review</p> <p>Water Drainage and Wastewater Management Plans (DWMPs)</p> <p>Water Drainage and Wastewater Management Plans (DWMPs) which are the new way for Water and Sewerage Companies (WaSCs) to plan for the future of drainage, wastewater and environmental water quality. DWMPs will be a key part of the evidence base to inform new local plan policies and planning decisions on new development and growth.</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	General (in relation to health including Health Impact Assessment)	<p>Thank you for the opportunity to comment on the draft Local Plan. The comments are submitted by South West London Clinical Commissioning Group (CCG). Separate comments have been submitted by NHS Property Services. The CCG has worked closely with the Council’s planning department and planning representatives regularly attend the Richmond Estates Forum.</p> <p>We note that a Health Impact Assessment (HIA) has been prepared which identifies the health and wellbeing impacts of the draft policies and site allocations.</p> <p>The draft Plan responds to the key challenges and trends facing the Royal Borough, including the longer-term impact of the Covid-19 pandemic, the climate emergency and population change.</p> <p>These key challenges will have an impact on healthcare services and wider health and wellbeing.</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Paragraph 2.24	<p>We note that paragraph 2.24 refers to the borough as prosperous, safe and healthy. However, there is a difference in life expectancy between people living in the most affluent and most deprived areas. Health inequalities have been exacerbated during the Covid-19 pandemic.</p> <p>In comparison to other London Boroughs, Richmond is relatively less deprived. However, within the Borough there are pockets of deprivation. The most deprived wards according to the Index of Multiple Deprivation (IMD, 2019) include Ham, Hampton North, Heathfield, Mortlake and Barnes Common, and Whitton.</p>

Heather Mathew, Richmond Council for Voluntary Service (CVS)	Paragraph 2.26	<p>2.26 In addition to an ageing population, it is important to highlight the high numbers of unpaid carers across the age ranges including older people, sandwich carers (care for a child and older relative) and young carers. Under the Care Act 2014, the local authority must make sure that residents:</p> <ul style="list-style-type: none">• receive services that prevent their care needs from becoming more serious, or delay the impact of their needs• can get the information and advice they need to make good decisions about care and support• have a range of provision of high quality, appropriate services to choose from <p>The pandemic has further highlighted the support needs of both the cared for and the carer and the local authority must promote and consider the needs of the carer in relation to access to employment, education, and access to local services.</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Paragraph 2.26	<p>We support the reference in paragraph 2.26 to the need to ensure that health and care services respond to a changing and ageing population.</p>
Heather Mathew, Richmond Council for Voluntary Service (CVS)	Paragraph 2.27	<p>2.27 “A large proportion are employed in highly skilled jobs” Whilst employment rates are high in the borough these figures divert attention from the employment challenges and skills gaps for a number of targeted groups and risk increasing inequalities for these groups. Planning can play a part in highlighting the needs of these groups, and build in expectations of developers to provide training, support, and employment opportunities that improve access and reduce inequity. In terms of employment, we know that for those who lack digital skills, those with low educational attainment, recent graduates, people aged 50+ seeking work and professions adversely affected by the pandemic such as retail and hospitality there are significant challenges. 6,070 young people age 16+ in Richmond are claiming universal credit or Job Seekers Allowance (LBRUT Children and Young People’s Plan refresh 2021) and the SEND Futures Plan, and the focus on transition highlights the employment needs of young people with SEND. Government initiatives such as the Kickstarter programme, and the Mayor of London’s mission “Helping Londoners into good work” are supporting activities such as the South London Partnership “Constructing South London” programme designed to build skills and match to work in the construction industry, but this is short term funding. The employment skills gaps and priority groups in Richmond need to be recognised in this plan, and where possible expectations made within the planning process that will generate opportunities for skills-based learning and employment for targeted groups.</p>
Clare Snowdon	Responding to a changing environment - paragraph 2.33	<p>2.33 I ask that we also declare a nature emergency - the ecological part of this crisis is too often overlooked and there is a very real danger of a "carbon land grab" which would see biodiversity displaced for offsetting and mitigation of the effects of greenhouse gas emissions</p>
Theresa Oddelm, The Royal Parks	Introduction, paragraphs 2.33 and 2.39 – comments specific to biodiversity and the Royal Parks’ Environmental Designations	<p>2 Introduction <u>Responding to a changing environment (p12)</u> We welcome inclusion of paragraphs 2.33 and 2.39 on climate change and biodiversity, which recognise that 'additional residential development and population growth will likely bring more access pressure to the borough's parks and open spaces and make trampling and erosion potential issues. However additional issues of air pollution and light pollution should be identified and included.</p>
Serge Lourie	Responding to a changing environment - paragraphs 2.33 – 2.40	<p>I am delighted that the Council has declared a climate emergency and is making this the underpinning of the draft borough plan. However, I am concerned that this is not strong enough where the Climate Emergency conflicts with other policies and I think that its priority of the planning round Climate Emergency should be made explicit in the borough plan. It is not unusual for policies to conflict in a planning document and my experience, as a Trustee of Richmond Charity Almshouses has shown that there is a danger of priority being given to aesthetic and historical considerations in developments in conservation areas and of listed buildings There have been a number of pre planning and planning decisions but I would like to concentrate on an application to install photovoltaics on Candlar's Almshouses, 79 Amyand Park Road, TW1 3HJ. 21/3000/HOT This application was turned down on 15 October 2021 by "reason of its combined siting and design would result in an incongruous, prominent and cluttered form of development that would impact on the unaltered roofscape and important unified composition of the former (SIC. THEY STILL ARE ALMSHOUSES) almshouses and thus fail to preserve or enhance the setting, character and appearance (of the) conservation area... "As a result of not accepting that photovoltaics, in themselves are helping to reduce CO2 emissions, this decision flies in the face of the Council's declaration of a climate emergency and contributed to higher cost of the residents in social housing. .</p>
George Goodby, Environment Agency	Introduction Chapter ‘Responding to a changing environment’ (Paragraph 2.33 to 2.40)	<p>At present, the earliest reference to the Thames Estuary 2100 Plan within the Local Plan is within Policy 8: Flood risk and sustainable drainage (Strategic Policy). We would encourage you to refer to the Thames Estuary 2100 Plan earlier on in this chapter, ‘Responding to a changing environment – paragraphs 2.33 to 2.40’. The TE2100 Plan sets out London’s flood risk strategy to the end of the century in response to a changing environment. We recommend the council include a summary of the issues and opportunities highlighted on page 82 of the TE2100 plan after section 2.38 or 2.39. A copy of the plan is available at Thames Estuary TE2100 Plan - GOV.UK (www.gov.uk). Please note that the Richmond Policy Unit is located in the TE2100 Plan’s ‘action zone 1’ on page 82. We also have the summary below which you may find useful: “The Plan divides the estuary into 23 policy units which are each assigned a flood risk management policy depending on the acceptable level of flood risk based upon what is being defended. Policies dictate the programme of flood defence maintenance and improvement activities. The Barnes & Kew policy unit has a Policy P5, to take further action to reduce flood risk beyond that required to keep pace with climate change. This means that the standard of protection against tidal flooding will be increased in the future. This will be achieved by improvements to the main tidal flood barrier on the Thames (currently the Thames Barrier at Charlton) together with improvements to the other flood defences e.g. river walls. As Richmond is affected by both tidal and fluvial flooding the Richmond and Twickenham policy units have a P3 (fluvial) and P5 (tidal) policy. Twickenham and Richmond policy units must have a P5 Policy for tidal flooding because the Thames Estuary 2100 Plan will allow higher water levels upriver of the Thames Barrier in the future. This will be on a regular basis. To offset this the flood defences in Twickenham and Richmond must be raised in the same way as other defences upriver of the Barrier to prevent regular tidal flooding of the riverside. The P3 policy is exclusively for fluvial flooding, to continue with existing or alternative actions to manage flood risk accepting that the likelihood of flooding will increase because of climate change. This is because how we use the Thames Barrier to manage flooding may change, this is to prolong the life of the Thames Barrier to protect from tidal flood risk.” Recommended action: We recommend you include a summary of the issues and opportunities highlighted on page 82 of the TE2100 Plan within the Introduction, chapter ‘Responding to a changing environment’ after Paragraph 2.38 or 2.39.</p>
Clare Snowdon	Paragraph 2.36	<p>2.36 I commend the borough on the reductions in emissions made so far and look forward to progress in that direction. I ask that planning embeds a requirement to move to renewables - possibly incentivising heat pumps and solar and eliminating dependence on gas</p>
Heather Mathew, Richmond Council for Voluntary Service (CVS)	Paragraph 2.36	<p>2.36 Inevitably those who need the upgrades to their energy efficiency the most are those who can least afford it. There have been council run green energy grant and initiatives targeted at these households – what is the data from this telling us and is there learning that we can take forward to inform the energy efficiency work.</p>

Clare Snowdon	Paragraph 2.39	2.39 I wholeheartedly support the protection of biodiversity in the borough and the plan to extend green spaces. One of the key aspects here is connectivity - one of the core ideas behind Nature-Connected Neighbourhoods - and so I would welcome moves towards urban greening - for instance urban hedgerows, such as the space found at the back of Squires on Wellington Road (opposite Fulwell Bus Garage), which is filled with bird life. Perhaps businesses offering quality (and biocide-free) space for nature could receive a reduction in business rates?
Clare Snowdon	Paragraph 2.40	2.40 I fully support an increase in active travel in the borough and the idea of the 20 minute neighbourhood sounds promising. I would like to see further measures towards significant reduction in car journeys to schools, such as the school streets initiative. Perhaps this could be extended to make all side roads with school entrances residents and access only
Clare Snowdon	Paragraph 2.42 in relation to the Corporate Plan objectives	2.42 I fully support this vision and these areas of focus
Clare Snowdon	Paragraph 2.44 in relation to Heathrow	2.44 I fully support the opposition to the expansion of Heathrow airport. Such plans have no place in a climate emergency
Catherine Rostron	Paragraph 2.44 in relation to Heathrow	I would like to say that I fully support the council’s objections to any further expansion of Heathrow. No other major city has a main airport which adversely affects as many of it’s residents because if the flight paths as London and Heathrow. It is the most significant factor reducing the quality of life in the Kew region of the borough.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Paragraphs 2.44 and 2.45, in relation to Heathrow	<p>We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re- allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the Introduction paragraphs 2.44 and 2.45.</p> <p>The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that ‘<i>The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights,..</i>’ ‘<i>The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.</i>’</p> <p>There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect. Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).</p> <p>There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.</p> <p>There are other national noise policies that could be deployed to deal with Heathrow noise.</p> <p>At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.</p> <p>Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.</p> <p>We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.</p>
Peter Willan and Paul Velluet, Old Deer Park Working Group	Paragraphs 2.44 and 2.45, in relation to Heathrow	<p>We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re- allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the Introduction paragraphs 2.44 and 2.45.</p> <p>The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that ‘<i>The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights,..</i>’ ‘<i>The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.</i>’</p> <p>There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect. Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).</p> <p>There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.</p> <p>There are other national noise policies that could be deployed to deal with Heathrow noise.</p> <p>At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.</p> <p>Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.</p> <p>We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.</p>
	Vision and Strategic Objectives	
Heather Mathew, Richmond Council for Voluntary Service (CVS)	General	Richmond CVS are pleased to have the opportunity to comment on the draft local plan. We are the local infrastructure organisation that supports and represents the interests of the Voluntary and Community Sector (VCS) in Richmond. We have submitted these comments to raise awareness of the value and contribution that the VCS bring to community development and sustainability, to highlight the needs of the sector as employers, service providers and owners/leaseholders of community buildings, and to create opportunities for investment into community buildings and services so that we are equal partners in future plans for the borough with particular reference to the 20 - minute neighbourhoods.
Rob Cummins, RHP	Section 3 - Vision and Strategic Objectives	<p>RHP support the strategic objectives of the plan.</p> <p>These objectives included specific recognition of the need to deliver “<i>new homes and an affordable borough for all</i>” with a “positive approach to incremental intensification ... and optimising delivery from larges sites to meet local housing needs.” The redevelopment of Ham Close will support this objective through the delivery of 452 homes.</p> <p>Other objectives, such as responding to the Climate emergency are tackled through the re-use of previously developed land, the introduction of renewable energy technologies, recycling of materials, sustainable urban drainage systems and adherence to the 20 minute neighbourhood principles.</p>

		The redevelopment will also align with the strategic objective for “ <i>securing new social and community infrastructure</i> ” through a new community centre and makers lab at Ham Close.
Mark Connell, Sphere25 on behalf of Hill Residential	3 Visions and Strategic Objectives	Hill Residential support the strategic objectives of the plan. These objectives included specific recognition of the need to deliver “ <i>new homes and an affordable borough for all</i> ” with a “positive approach to incremental intensification ... and optimising delivery from larges sites to meet local housing needs.” The redevelopment of Ham Close will support this objective through the delivery of 452 homes. Other objectives, such as responding to the Climate emergency are tackled through the re-use of previously developed land, the introduction of renewable energy technologies, recycling of materials, sustainable urban drainage systems and adherence to the 20 minute neighbourhood principles. The redevelopment will also align with the strategic objective for “ <i>securing new social and community infrastructure</i> ” through a new community centre and makers lab at Ham Close.
Nina Miles, GLA on behalf of Mayor of London	Vision and Strategic Objectives	The Strategic Vision for growth ‘The best for our borough’ is informed by ten themes that have been developed since the Direction of Travel Consultation in 2020 and looks ahead over the next 15 years of the plan period to 2039 based on a 2024 adoption. The themes and objectives align well with the London Plan Good Growth policies including <i>Delivering new homes and an affordable borough for all</i> with policy GG4 Delivering the homes Londoners need and <i>Increasing jobs and helping business to grow with policy GG5 Growing a good economy</i> .
George Goodby, Environment Agency	Vision and Strategic Objectives Chapter - Local Plan Strategic Vision ‘The best for our borough’	The first sentence of paragraph three discusses ‘ <i>responding to the climate emergency and taking action</i> ’. We recommend that you also refer to ‘reducing flood risk’ after improving ‘cutting emissions and improving air quality’. This is because large parts of the borough are impacted by flood risk, which with climate change may increase, and therefore tackling this should be a key part of the local plan. The wording could be updated to the following: “ <i>The borough has been responding to the climate emergency and taking action, tackling the challenges of climate change, reducing flood risk, and cutting emissions and improving air quality, and following the principles of a circular economy</i> ”. Recommended action: We recommend you include ‘reducing flood risk’ within the Local Plan Strategic Vision, specifically as part of ‘responding to the climate emergency and taking action’.
George Goodby, Environment Agency	Strategic Objectives - Responding to the climate emergency and taking action	The climate emergency and biodiversity crisis are inextricably linked; climate change is one of the main drivers for biodiversity loss, and the destruction of ecosystems undermines nature’s ability to regulate greenhouse gas. Therefore, the two crises must be tackled together. This is a crucial point and should be stated in the strategic objectives. For bullet point 2 “ <i>promote and encourage development to be fully resilient to the future impacts of climate change</i> ”, consideration should also be given to using Nature Flood Management (NFM) techniques where possible. Allied with this is the protection and enhancement of rivers and river corridors. The focus here should be on re-naturalising the river wherever possible, encouraging soft engineering approaches to riverbank protection and incorporating an undeveloped buffer zone in the river corridor. This is aligned with requirements under the Water Framework Directive (WFD) which should be mentioned here. Local Authorities have a statutory duty to deliver WFD objectives under the Water Environment Regulations (2017) and much can be achieved through the planning system. Please see our Catchment Data Explorer for further information on the WFD status of waterbodies in the Borough.
George Goodby, Environment Agency	Vision and Strategic Objectives Chapter – ‘Increasing biodiversity and the quality of our green and blue spaces, and greening the borough’	In bullet point 8, we advise that you include reference to ‘flood storage’ in this section. This would recognise the multi-beneficial outcomes that protecting and naturalising our rivers can achieve. The wording could be updated to the following: <i>‘Protect and improve the unique environment of the borough’s rivers, especially the River Thames and its tributaries as wildlife corridors, as flood storage, as opportunities for recreation and river transport, increasing access to and alongside the rivers where appropriate, and gain wider local community benefits and habitat improvements when sites are redeveloped’</i> . Recommended action: We recommend you include ‘as flood storage’ within the ‘Increasing biodiversity and the quality of our green and blue spaces and greening the borough’ strategic objective.
George Goodby, Environment Agency	Vision and Strategic Objectives Chapter - Improving design, delivering beautiful buildings and high-quality places	Within bullet point two of the strategic objective of ‘Improving design, delivering beautiful buildings and high-quality places’ we recommend that you include ‘resilient to climate change’. This would reiterate the council’s focus on the climate emergency and demonstrates to applicants that it is key to consider climate change from the beginning of the design process rather than an after thought. For example, if finished floor levels need to be raised to protect a building from flood risk then this needs to be considered in the design and access arrangements from the start to ensure the building interacts well with its surroundings. The wording could be updated to the following: ‘ <i>Provide a positive approach to accommodate growth across the borough, enabling tall buildings and higher density development in appropriate locations, where all development is of high design quality to create well-designed, meaningful, practical, resilient to climate change, and well-connected places</i> ’.
Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Strategic Objectives	Strategic Objectives – Climate Emergency and Biodiversity, green and blue spaces The need to respond to the climate emergency and tackling the challenges of climate change, cutting emissions and improving air quality, and following the principles of a circular economy is recognised and supported. We advocate the need to meet high standards for sustainable design, increased urban greening and tackle biodiversity loss. Notwithstanding this, these standards need to align with those in the London Plan. They also need to be considered as part of planning balance when determining applications and applied flexibly where specific site circumstances or competing planning considerations mean that minor deviations are necessary. Strategic Objectives – Delivering new homes and an affordable borough for all We support the aspiration to deliver new homes and an affordable borough for all through the increase in housing delivery on small sites and optimising large sites to deliver a minimum of 411 new homes per annum. London Square are seeking to deliver a significant number of new homes, including affordable provision within the borough which is in line with this strategic objective and in conformity with the London Plan. Notwithstanding this, we note that the Richmond Local Housing Market Assessment (2021) identifies an increased need for 1,123 affordable homes per annum and states that “ <i>affordable housing delivery – including most prominently for London Affordable Rent/social rent - should be maximised where opportunities arise</i> ”. This key strategic objective could therefore be more effectively realised with more brownfield and larger sites, such as the former Greggs bakery, being allocated for residential or mixed use development. Strategic Objectives – Jobs and Business The need to increase jobs and achieve business growth following the pandemic is understood and supported. However, we do not support the blanket approach to protecting the borough’s Key Business Areas and industrial land and business parks. NPPF (2021) paragraph 8 states the economic objective of the Framework is to ‘help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure’. Paragraph 122 of the NPPF also notes that: <i>‘Planning policies and decision need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan: a) It should, as part of plan updated, reallocate the land for a more deliverable use that can help to address identified needs (or, if more appropriate, deallocate a site which is undeveloped);’</i> The Greggs Site has been out of operation and marketed since February 2018 without interest from potential occupiers. The Site has therefore been underutilised for nearly four years and has failed to support growth, innovation and improved productivity in line with the NPPF during this time. Due to the specific site constraints, relating to highways, access and amenity issues no planning application for continued employment use has been put forward since the closure of the bakery. Whilst these constraints remain, there is no reasonable prospect of an application coming forward for a solely employment use and therefore in line with NPPF policy, the Site as part of the updated plan should be reallocated for a more deliverable use that can help to address identified needs. In this instance, due to the surrounding residential context, the Site clearly provides opportunities to contribute to meeting the housing target in Strategic Policy 10 and growth aspirations for this part of the borough.

		A more flexible and site-specific approach would also align with the London Plan, where Policy E7 requires LPAs to identify opportunities for industrial “intensification, co-location and substitution” based on a robust evidence base and assessment of each site’s suitability for continued industrial use, including the introduction of other uses if “there is no reasonable prospect of the site being used for the industrial and related purposes.” There is no evidence of Richmond applying this criteria-based approach to the continued designation of Greggs bakery for employment use only, meaning this policy is unjustified and ineffective at encouraging business growth.
Theresa Oddelm, The Royal Parks	Strategic Objectives – comments specific to biodiversity and the Royal Parks’ Environmental Designations	Strategic objectives (p16 onwards) We welcome the prominence of climate change, culture and heritage and biodiversity within the strategic objectives.
Luke Burroughs, Transport for London (TfL) Commercial Development	General comment in relation to TfL Commercial Development and the vision	Thank you for providing the opportunity to comment on the Local Plan Regulation 18 consultation. Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory role as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties. Local Plan Strategic Vision ‘The best for our borough’ TfL CD broadly supports Richmond’s strategic vision for the borough. We are particularly supportive of the strategic objective to meet housing targets set out in the London Plan and to “ <i>maximise delivery of genuinely affordable housing across the borough</i> ” TfL CD is committed to delivering 50% affordable housing (by habitable room) across its portfolio as instructed by the Mayor and look forward to working with the Council to achieve this on TfL owned sites in the borough. We are also supportive of the borough’s commitment to “ <i>Provide a clear pathway to zero-carbon for all types of new development, to minimise and mitigate the effects of climate change by requiring high levels of sustainable design and construction including reductions in carbon emissions</i> ”. TfL has recently published its sustainable development framework which aims to maximise social, environmental and economic sustainability on TfL development across London.
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Vision and Strategic Objectives	The plan’s Vision is shaped by other Council plans and strategies. We suggest that reference is made to the Joint Health and Wellbeing Strategy and the Richmond Health and Care Plan under a new section perhaps titled ‘A healthier borough’. We support the Vision itself and the references to securing new social and community infrastructure and creating safe, healthy and inclusive communities. We note that the Strategic Objectives reflect the Vision. We welcome the objective to secure new social and community infrastructure but suggest additional wording “to ensure that health and care services and infrastructure are provided to support and growing and changing population”. We welcome the objective to create safe, healthy and inclusive communities, but suggest additional wording “to support development that promotes healthy lifestyles and reduces health inequalities” to reflect Policy 51. Health and Wellbeing. We note that the final bullet point refers to the environmental impacts of development. The health and wellbeing impacts of development extend beyond environmental issues and impacts and we suggest that the wording is amended to read: “Ensure that development does not a negative impact on health, safety and the amenity of existing and new users or occupiers of a development or those living or working in the surrounding area.”
	Spatial Strategy, Place-based Strategies and Site Allocations	
Nina Miles, GLA on behalf of Mayor of London	Spatial Strategy	We welcome the overarching aim to direct new higher density development to sites in town centres or places that are well connected by public transport, walking and cycling to jobs, services, infrastructure and amenities. This aligns with London Plan Good Growth objective GG2 Making the best use of land and London Plan town centre policies SD6 and SD7. We support the 20-minute neighbourhood and ‘living locally’ concept that underpins much of the plan. This aligns with the London Plan’s Healthy Streets Approach to reducing car dominance and increasing walking, cycling and public transport use (Policy T2 LP2021) as well as London Plan Good Growth objectives GG1 and GG2. Spatial Policy 2 is welcomed, particularly part B with regards to prioritising previously developed land and the support for refurbishment over demolition. This aligns with London Plan Policy D3 and the circular economy principles of minimising the use of new materials. The reference to the London Plan’s Good Growth objectives in paragraph 4.17 is welcomed and supported.
Tim Harrington	Omission - sites	My response relates to what is missing from the local plan rather than what is in it, so I cannot give detailed page numbers etc. There appear to be many plots of land which are not included in the local plan (examples to follow below). My questions is why are some plots of land included when others are not for example Richmonf Athletic Club is included but Richmond Cricket Club is not? Land which should be considered to be included would be the building next to the BP garage on the lower Mortlake road, North West of Manor Circus Roundabout which has been unsued for a decade and is now a car wash ? This building needs a vision to get it back into use either for residentia or commercial use. Also the plot of East land on the Sandycombe road, which was a old second hand car garage and has remained derilct for many years, why is this plot not included in the plan?
Matthew Bolton	Omission - sites	[See comments in relation to place-based strategy for Hampton & Hampton Hill and other sites that should be included]
Michael Cross	Spatial Strategy, Place-based Strategies and Site Allocations (in relation to site opportunities)	General point around the sites for potential development, and I would have thought there are additional ones e.g. the carpark at Richmond railway station could be converted/demolished and replaced by commercial property. The whole of Richmond railway station could be configured with development across the top by building upwards on the site.
Alice Roberts, CPRE London	Spatial Strategy, Place-based Strategies and Site Allocations (in relation to site opportunities)	The Borough does not appear to have carried out a rigorous study to unearth all the opportunities available to meet this unmet need , for example: <ul style="list-style-type: none">• The Mayor of London’s Fulwell Landholding is next to a railway station and the parts used for a single storey supermarket, DIY store and surface parking should be redeveloped with air-rights housing• The Uxbridge Road Sainsbury’s (site allocation 5) could have air-rights housing above the main store too and not just the car park• The Hanworth Homebase on Staines Road could be redeveloped for air-rights housing (the Hanworth sites in LBRuT)• There needs to be a detailed assessment of all town centres to establish the housing potential and infrastructure needs
Alec Lever, Richmond Labour Party	General comments (in relation to site opportunities)	Rather than dissipate our constructive contributions to the plan with detailed prescriptions for action in each locality as this template requires, we offer these ideas for consideration, missing in the space allocation proposal. Plan to allocate space for; 1. NHS Surgeries 2.Pre-school Sure Start nurseries 3.Local Police & CSO4 outposts 4.A Richmond Magistrates Court 5.Two hands-on experience centres for primary and secondary pupils to excite interest in future skills .e.g. Robotics, VR, 3D printing, renewable energy localisation, Net Zero jobs. 6. Green Homes adaptation work spaces along the value chain including manufacture. 7. Public transport hubs for 10 seat hail and ride EVs in underserved 'long walk' wards. 8. EV street charging points 9. Increasing social housing provision in redevelopment sites beyond current proposals which allocate the incremental homes to expand private buy to let sector market sales.

David Wilson, Thames Water	Draft Site Allocations (general)	<p>As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. These representations are also prepared on behalf of Thames Water as a landowner within the Borough, and we refer to previous submissions to the ‘Call for Sites’. [See comment in relation to Call for Sites]</p> <p><u>Draft Site Allocations</u></p> <p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>Process</p> <p>We use the information in local plans to estimate when upgrades will be required. It is therefore important that the local authority keep us informed of any changes to local plan numbers and how well they are delivering homes against those objectives. Where this doesn’t happen it could lead to delays in the delivery of vital infrastructure</p> <p>Network</p> <p>Where offsite upgrades are required to serve development they will be delivered and funded by Thames Water using infrastructure charges more info here https://www.thameswater.co.uk/developers/charges</p> <p>The attached table provides Thames Water’s site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none">• What drainage requirements are required on and off site• Clarity on what loading/flow from the development is anticipated• Water supply requirements on and off site <p>The time to deliver upgrades shouldn’t be underestimated it can take 18months – 3 years from the time of certainty and in some cases it may be appropriate for a suitably worded planning condition to be attached to ensure development doesn’t outpace the upgrades. Developers are encouraged to engage at the earliest opportunity to discuss their development needs via Thames waters pre planning service https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section.</p> <p>Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.</p> <p>We are also in the process of creating long term drainage and wastewater management plans (DWMP) with objectives that overlap with those for Richmond, such as sustainable drainage and water management. The local plan shows support from Richmond for sustainable surface water drainage and engaging with relevant stakeholders because of the flooding risk, which we also support. Thames Water is addressing sewer flooding risk and welcomes support from the council to mitigate misconnections into the foul and surface water sewers.</p> <p>[See other comments for the details from the attached table which relate to a number of site allocations]</p>
David Wilson, Thames Water	Site Allocations – Call for Sites – Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road and Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road	<p>Thames Water previously put forward the following to the ‘call for sites’ in 2020 (Respondent Ref: 74):</p> <p>1. Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road:</p> <p>Site area: approximately 3.58 hectares (refer to enclosed location plan).</p> <p>Current use: vacant land/retained operational land.</p> <p>Proposed use: residential or mixed use development.</p> <p>Likely availability: 1-5 years.</p> <p>The site is currently within the Green Belt, but is very well contained and sandwiched between the Stain Hill West Reservoir to the east and residential development along Kenton Avenue with Upper Sunbury Road forming the northern boundary and Lower Hampton Road forming the southern boundary.</p> <p>We disagree with the Green Belt review and consider the site does not perform strongly in Green Belt terms. The Green Belt review is unclear as to which which settlement sprawl is being referred to as the River Thames separates Molesey and Hampton and this part of Green Belt is not strategic in the whole parcel (i.e. the assessment of the parcel in its entirety leads to a flawed judgement and assessment of the Green Belt). There is a broken Green Belt connection around the land to west of Stain Hill West Reservoir. It is therefore considered that the site should be removed from the Green Belt.</p> <p>2. Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road: (refer to enclosed location plan).</p> <p>Current use: retained operational land and 3rd party leases</p> <p>Proposed use: the site was previously put forward for water infrastructure and mixed use development. The site is currently being assessed for new Water Supply development as part of Thames Water’s new Water Resource Management Plan. The site is being proposed as a new effluent treatment plant for water supply.</p> <p>This site is currently within the Green Belt, but is also well contained and sandwiched between development along Oldfield Road and Portlane Brook (with Kempton Racecourse beyond) with Upper Sunbury Road forming the southern boundary and the railway line to the north. We disagree with the Green Belt review and consider the site does not perform strongly in Green Belt terms. The Green Belt review is unclear as to which settlement sprawl is being referred to as the River Thames separates Molesey and Hampton and this part of Green Belt is not strategic in the whole parcel. It is therefore considered that the site should be removed from the Green Belt.</p> <p>London’s water needs are the key driver for the strategic resource options programme which supports the development and delivery of strategic schemes that will provide long term resilience to clean water provision for the region. This site represents a large landholding strategically located near key existing sewage treatment sites (Mogden STW in LB Hounslow and Hogsmill STW in RB Kingston upon Thames), water treatment sites (Hampton WTW; Kempton WTW; Walton WTW) and a number of reservoirs in south west London and therefore is critical to supporting this strategic development. As such, it is considered that exceptional circumstances exist to release this site from the Green Belt in order to ensure the delivery of critical infrastructure is made more straightforward within the planning system.</p> <p>The above sites are currently retained operational land but are included in a review that Thames Water is carrying out of its landholdings to establish both strategic needs for future infrastructure (Hydes Field), and also whether a site can be released for redevelopment (land to West of Stain Hill West Reservoir). Consistent with that review process and to ensure appropriate development plan support is available for these potential essential infrastructure developments, it is also considered that the Hydes Field site should be allocated in the new Local Plan as a future infrastructure development site, with its use defined as for water and / or wastewater infrastructure provisions.</p>

		<p>[See Appendix 2 for site location plans for Hydes Field, Hampton Water Treatment Works and Land west of Stain Hill Reservoirs]</p> <p>There may also be other landholdings within the locality that may be suitable for development and Thames Water would be pleased to discuss the potential for making these sites available further with the Borough. There is therefore an opportunity for the sites to contribute towards landscape and biodiversity enhancement, which would be supported by allowing some essential infrastructure development. Any future use of these sites would be expected to integrate the provisions of emerging policy in respect of biodiversity net gain, and local requirements relating biodiversity and landscaping, to ensure their strategic future development is appropriately integrated within their receiving environments.</p>
Tim Catchpole, Mortlake with East Sheen Society	Site Allocations – Call for Sites – Schedule of Sites not taken forward as Site Allocations: Richmond Park Academy and Christ’s School	We note with concern the Council’s statement that the Stag Brewery Site Allocation is taken forward in the draft Local Plan and still includes a new 6-form entry secondary school in line with the Council’s School Place Planning Strategy. We disagree with this element of the site allocation for reasons given above.
Tim Catchpole, Mortlake with East Sheen Society	Site Allocations – Call for Sites – Schedule of Sites not taken forward as Site Allocations: Mortlake Station area	We note with concern that the Mortlake station area is now excluded since its “fragmented ownership means that it is unlikely to come forward as a comprehensive site or be deliverable”. We do not agree with this. The station area is a dangerous and unwelcoming area. Much of the land that holds the key to a comprehensive improvement is owned by Network Rail and is let on short leases.
James Sheppard, CBRE, on behalf of LGC Ltd	Site Allocations – Call for Sites – LGC site	<p>7. Summary:</p> <p>It is disappointing that after such a long period of Local Plan engagement, including in respect to the now adopted Local Plan, that the wide-ranging benefits of a mixed-use redevelopment in this location have not translated into an allocation.</p> <p>In our strong view, the site lends itself well to a mix of employment and residential uses. The sustainably located, brownfield site can provide for a comprehensively master planned, mixed-use development that retains LGC in the borough, provides new employment space for new, expanding and relocating businesses and delivers much need homes. Importantly, it is clear from the continued under-delivery of affordable housing that the site could serve as a productive and effective contributor to the Council’s affordable housing land supply over the forthcoming plan period. In addition, redevelopment could successfully activate the street scene, provide new high-quality publicly accessible green spaces, enhance permeability and promote active travel, be outward facing and connect with the local urban design vernacular.</p> <p>A new, fit-for-purpose building that meets the current and future needs of this modern, high-technology, knowledge-based employer is vital. LGC attracts highly skilled employees in the life sciences sector. It is broadly accepted that a borough’s ‘stock’ of high skilled workers is one of the key determinants of its economic performance. Thriving local economies require a local workforce with high levels of employability. It should be that employment and skills are drivers of local economic growth. A motivated, flexible, and skilled workforce attracts employers and boosts productivity.</p> <p>Aside from the demonstrable economic benefits there are also a broad number of social and demographic benefits. Indeed, without opportunities for skilled work, the local authority will risk an ageing workforce as young people will ultimately relocate from such an area in search of higher skilled work, training and other benefits elsewhere.</p> <p>It is evident that LGC contribute economically to LBRuT, however, it is not solely the economic value that is important, but also the global reputation of scientific excellence that it provides within the life sciences sector, which is directly associated with Teddington.</p> <p>There is a compelling case for enabling development in this instance, whereby LGC can continue to reside and operate its headquarters from the borough for many years to come, retaining highly skilled employees within a renowned and growing business of both national and global significance.</p> <p>In summary, a proportion of the site is surplus to LGC requirements, whilst the headquarters facility requires substantial modernisation through redevelopment. A sustainable mixed-use allocation including for both employment and residential use would be both suitable and appropriate enabling development, allowing LGC to have a continuing presence in Teddington for the long term. Any mixed-use development proposal for the site would actively seek to make effective use of land, re-providing and enhancing net existing employment floorspace whilst providing for significant housing delivery, including much needed affordable housing.</p> <p>The Council’s support would be strongly welcomed, helping to secure LGC within the borough whilst simultaneously protecting Teddington’s rich scientific heritage long into the future..</p>
Philip Villars, WSP on behalf of Sharpe Refinery Service Limited	Schedule of sites not taken forward as Site Allocations – Arlington Works	<p>- the schedule refers to our client's site as respondent no. 81. We have stated in comments on Policy 8 that the contribution that the site could make to the area has been dismissed and does not accord with the principles of paragraph 16 of the NPPF. However, there are factual inaccuracies within the reason column of the document. Arlington Works is not a designated Locally Important Industrial Land and Business Park within the adopted Local Plan, Policy LP42. It includes Twickenham Studios within the list but does not include Arlington Works and no evidence has been submitted to the contrary. We are therefore of the view that the supporting evidence base of the new Local Plan would not meet the tests of soundness set out within Section 3 of the NPPF and case law.</p> <p>Changes considered necessary in relation to the Schedule of Sites Not Taken Forwards:</p> <p>The detail within the reason column is factually incorrect and should be corrected. Within the meaning of Paragraph 31 of the NPPF the Schedule of Sites Not Traken Forwards does not provide a relevant or accurate evidence upon which to base a site allocations policy.</p>
Luke Burroughs, Transport for London (TfL) Commercial Development	Schedule of sites not taken forward as Site Allocations – Fulwell Bus Garage and Lidl	<p>Place-based Strategy for Twickenham, Strawberry Hill & St Margarets</p> <p>We are supportive of the Council’s recognition that this area is an appropriate location for growth. TfL has two significant landholdings in this area.</p> <p>Fulwell Bus Garage and Lidl</p> <p>It is disappointing that the TfL Land at Fulwell Bus Garage and Lidl has not been allocated for development despite TfL promoting this site in the previous call for sites.</p> <p>In the ‘<i>Schedule of sites not taken forward as Site Allocations in the new Draft Richmond Local Plan</i>’ the following reason is given for Fulwell Bus Garage not being included as a site allocation in the Local Plan:</p> <p><i>The bus garage is in use with no plans for the operations to cease. The loss of existing bus garages is resisted in the draft Local Plan, to safeguard capacity for efficient and sustainable operation of the network. The building is also designated as a Building of Townscape Merit (BTM). There are no details of any comprehensive approach to bringing forward redevelopment of the wider site.</i></p> <p>As TfL CD set out in our response to the ‘Consultation on the Local Plan Direction of Travel and Call for Sites Consultation’ in March 2020, the bus garage use would be re-provided to support the efficient and sustainable operation of the network consistent with London Plan and emerging Local Plan policies that protect bus infrastructure. The reference to Fulwell Bus Garage being a Building of Townscape Merit and thus not being able to be developed does not account for the potential to incorporate the buildings into a wider scheme. The wording also does not reflect the significant benefits that a redevelopment could bring to the area, particularly in terms of permeability and accessibility, public realm, new homes and jobs.</p> <p>As mentioned in TfL CD’s previous response TfL own the freehold of both Fulwell Bus Garage and the LIDL site, and look to engage with the bus operator (RATP) and the GLA about the opportunity for a comprehensive redevelopment of the wider site. A site allocation would help to facilitate a comprehensive scheme for the wider site. Please see appendix 2 for a map of TfL landholdings at Fulwell.</p> <p>[The map was not enclosed, but maps were provided previously to the Call for Sites and are published in the Schedule of Call for Sites all responses received – Appendices (pages 4 and 5)]</p> <p>[See comment in relation to Site Allocation 15: Station Yard, Twickenham]</p>
	Policy 1. Living Locally and the 20-minute neighbourhood (Strategic Policy)	

Tim Catchpole, Mortlake with East Sheen Society	Policy 1. Living Locally and the 20-minute neighbourhood (Strategic Policy)	We agree with this logic.
Heather Mathew, Richmond Council for Voluntary Service (CVS)	3 suggested key areas for inclusion - 1) Understanding and representing the value and contribution that the voluntary sector make to the achievement of the ambition of this plan and using the leverage that the planning has on development to support investment in community assets both capital and operational	<p>1) Understanding and representing the value and contribution that the voluntary sector make to the achievement of the ambition of this plan and using the leverage that the planning has on development to support investment in community assets both capital and operational</p> <p>The borough has a long history of an active and supportive voluntary and community sector (VCS) that enables and promotes health and well- being outcomes across the age ranges. A large number of voluntary sector organisations also own or lease community buildings in the localities from which they deliver their services. It is a significant employer, and this is an area of expected growth particularly in relation to health and social care roles. Its ability to mobilise and adapt to meet the needs of the local community were further highlighted by the pandemic, and the council relied heavily on health and social care organisations and the community centres and neighbourhood care groups network to reach the most vulnerable and provide essential services via trained and vetted volunteers. The VCS provide early intervention and an ongoing level of support in the community that acts as a buffer for both health, community and social care services and more broadly sports, leisure, and cultural venues and activities, that is increasingly being recognised as social capital with an associated value which should be considered when developing plans for investment.</p> <p>The vision statement The role of the development plan “ is to inform investment in social and physical infrastructure”, and to provide “a clear picture of the role that development should play in creating sustainable growth” The pandemic has further intensified the financial pressures on the voluntary sector, and there is a significant challenge relating to affordable accommodation, and the repair and maintenance costs on existing buildings they occupy. Within the concept of the 20-minute neighbourhoods the plan refers to a range of intended outcomes including</p> <p>“create environments that enable active resilient and inclusive communities – place based connections that put people first”</p> <p>“Key meeting places where social interaction and a sense of community is fostered”</p> <p>“support the borough’s diverse arts and culture offer recognising their importance to enriching local community”</p> <p>“Protect and enhance the boroughs multifunctional green and blue infrastructure”</p> <p>“recognise the importance of health as a cross-cutting priority”</p> <p>Voluntary and Community Sector organisations provide services and hubs that support all these outcomes and many more across the social spectrum, and yet the vision statement at 3.2 relating to the 20 minute neighbourhood makes no direct reference to the role of the voluntary sector in enabling that vision nor does the plan reflect the support and investment that the VCS needs, alongside businesses, to be sustainable and promote growth. At pg 21 we suggest adding the following bullet point</p> <p>“ All development should “</p> <ul style="list-style-type: none">• Demonstrate their understanding and awareness of the VCS provision locally and how investment in existing community buildings, spaces and infrastructure will support the living locally concept. <p>[See also comment in relation to Area profiles and community mapping]</p>
Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	Policy 1 - 'Living Locally'	<p>The Plan vision references the outcome of the 'living locally' concept: by 2039 everything a local resident needs can be reached within 20 minutes by foot or bike. The RFU support the living locally approach for access to essential services to fulfill daily needs, as well as improving sustainable modes of transport and access to the stadium. However, the vision and the corresponding policy (Policy 1) as currently drafted applies to 'all development, except householder applications' and needs to clarify exclusions for Twickenham Stadium as an internationally significant sporting and entertainment venue.</p> <p>To address this, we would suggest that Policy 1 (Part C) be redrafted as follows:</p> <p><i>“C. All development (except householder applications for alterations and Twickenham Stadium and its linked uses as a sporting and entertainment venue) should:</i></p> <ol style="list-style-type: none"><i>1. demonstrate how they will deliver improvements that support the ‘living locally’ concept;</i><i>2. be permeable by foot and cycle, with good connections and signage to local walking and cycling routes/networks as well as public transport;</i><i>3. demonstrate that future occupiers of the development are able to meet their shopping, work, recreational and cultural needs within a 20-minute walk or cycle and how the new development will contribute to sustaining the ‘living locally’ concept;</i><i>4. demonstrate that the proposals will not lead to any deterioration in the provision of, and access to, services to meet shopping, work, recreational and cultural needs for local communities;</i><i>5. demonstrate how a proposal will reduce the dominance of vehicles.</i> <p><i>Major developments of 10 or more residential units or non-residential development of 500sqm of floorspace or more:</i></p> <p><i>6. must demonstrate how the proposal will improve local walking and cycling routes, including accessibility to the existing network, in areas with lower levels of public transport accessibility or higher levels of health deprivation and disability”.</i></p> <p>The need to retain sufficient parking, particularly for coaches, servicing facilities and space for spectators and related services is recognised in the site allocation. The above change would remove any conflict between this and Draft Policy 1.</p> <p>As noted in the supporting text to Draft Policy 1, one of the underlying aims of the 'living locally' concept in Richmond borough is to reduce urban carbon emissions and biodiversity loss. We consider the proposed exclusion from this policy is acceptable, as any development on the Twickenham Stadium site would still be required to meet relevant London Plan and Local Plan policies promoting sustainable transport, healthy streets and measures to improve biodiversity and air quality (e.g. London Plan policies T1, T2, T3, T4, T6.4, SI1 and LBRuT Draft Local Plan Policy 3, 23, 48 and 53).</p>
Alice Roberts, CPRE London	Policy 1 - Living Locally and the 20-minute neighbourhood	<p><u>20 minute neighbourhood concept</u>, as defined, does not incentivise local living / less car-use. The borough appears to define 20 min neighbourhoods as twenty minutes one way on foot or cycle -</p> <p>- when the appropriate definition (appropriate to encouraging local life and active travel in order to reduce car trips etc), defines it as 10 mins on the outward leg and 10 mins back by foot only.</p> <ul style="list-style-type: none">• This should be re-defined as meaning 10 minutes walk to and 10 minutes walk from• More is needed to set out what services are needed and what new hubs need to be set up to create genuine twenty-minute neighbourhoods.• More is needed on how to link walking / cycling to the rail/tube network i.e. secure cycle storage by all stations.
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 1. Living Locally and the 20-minute neighbourhood (Strategic Policy)	<p>We support Policy 1. Living Locally and the 20-minute neighbourhood which will enable healthier lifestyles. One of the adjustments needed to respond to Covid-19 and climate change is to enable people to ‘live locally’ and a renewed focus on high streets and local centres as destinations.</p> <p>We would welcome the opportunity to discuss what the 20-minute neighbourhood concept means for healthcare services and models of care – see also Policy 49 clause B 4.</p> <p>It is recognised that the NHS has a role in supporting the regeneration of town centres. The Health on the High Street report (NHS Confederation, December 2020) outlines the opportunities for the NHS to become directly involved in the high street policy agenda which could include running health services from vacant property, including vaccination programmes, broadening the range of services provided within communities and supporting and participating in the design of healthy communities and places.</p>
Catherine Rostron	Map 4.1 200, 400, and 800 metre buffers around centre boundaries in the borough. Paragraph 4.11	<p>This looks impressive but in reality it needs to include analysis of the facilities provided too. Using the example of my local area around Kew Gardens station, it does have a thriving local parade but because it is a tourist hot spot this is heavily weighted towards coffee shops. In determining whether to ‘20 minute neighbourhood’ is achieved the range and quality of the facilities needs to be included.</p>
Michelle Eden	General comment in relation to cycle infrastructure, Paragraph 4.12	<p>This is a general comment relating to cycle infrastructure across all boroughs. We need safe and secure storage to prevent theft of bicycles in all shopping areas not just bike shelters or a rack. CCTV will not prevent your bike being stolen either. Could the council consider subsidised bike lockers perhaps or a council run bike valet/repair service. I would be prepared to pay for my bike to</p>

		be safely stored, whilst I shop . I would love to be able to cycle more locally but not having secure bike storage is not encouraging me to get out of my car, along with not feeling safe on the road at the moment. There is often empty shops in Kingston upon Thames and Richmond that would be suitable for this type of valet cycle hub/repair/hire service.
	Policy 2. Spatial Strategy: Managing change in the borough (Strategic Policy)	
Tim Catchpole, Mortlake with East Sheen Society	Policy 2. Spatial Strategy: Managing change in the borough (Strategic Policy)	We agree with the logic but note that it then leads into the spatial strategies for the nine distinct areas of the Borough and we wonder, as mentioned above, why these should appear upfront and not at the end of the document.
Hannah Gray, Avison Young on behalf of National Grid	Policy 2. Spatial Strategy: Managing change in the borough (Strategic Policy) - Utilities Design Guidance	The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Grid infrastructure. National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets. Therefore, to ensure that Spatial Strategy Policy 2 is consistent with national policy we would request the inclusion of a policy strand such as: <i>“E. Proposals will take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”</i>
George Goodby, Environment Agency	Policy 2. Spatial Strategy: Managing change in the borough (Strategic Policy) – General comments in relation to biodiversity overview	Under Section 6(1) of the Environment Act (1995) the Environment Agency has a duty to promote the conservation and enhancements of habitats and species dependent on aquatic environments. The quality of our water environment and the diversity, connectedness and resilience of aquatic species and habitats are intrinsically linked. The protection and enhancement of such habitats will be vital to achieving the requirement of the Water Framework Directive (WFD) to “good” ecological status in all WFD waterbodies by 2027. We are pleased to see that it is a strategic aim of the plan (Policy 2) to ensure that growth is delivered in a sustainable way, whilst tackling the climate emergency and biodiversity crisis. Climate change is one of the main drivers for biodiversity loss, and the destruction of ecosystems undermines nature’s ability to regulate greenhouse gases.
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 2. Spatial Strategy: Managing change in the borough	The Local Plan aims to meet the needs of local communities and businesses through the provision of housing, employment, schools, community services, social infrastructure, leisure and other local services, in a sustainable way. We suggest that reference is made to the Infrastructure Delivery Plan to ensure that growth is delivered with sufficient supporting infrastructure.
Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to sustainable growth)	Sustainable Growth. We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to Policy 18 . [see comment in relation to Policy 18] In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise "Improvement" as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to sustainable growth)	Sustainable Growth. We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to Policy 18 . [see comment in relation to Policy 18] In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise “Improvement” as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.
	Places	
Vicky Phillips, Habitats & Heritage	Site Allocations	We support the need to provide new open space in all new developments expressed in many of the site allocation proposals.
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Places and Site Allocations	The borough has been divided into nine high-level ‘places’. Key sites as site allocations are identified in each place. Many of the site allocations have been rolled forward from the adopted Local Plan and the Twickenham Area Action Plan. The CCG has responded to individual masterplans and planning applications for some of these key sites.
Heather Mathew, Richmond Council for Voluntary Service (CVS)	3 suggested key areas for inclusion - 1) Understanding and representing the value and contribution that the voluntary sector make to the achievement of the ambition of this plan and using the leverage that the planning has on development to support investment in community assets both capital and operational	Area profiles and community mapping The first systematic mention of the voluntary and community sector is at page 295 (of 341) where it is acknowledged that “social and community infrastructure facilities provide for the health and welfare, social educational, spiritual, recreational leisure and cultural needs of the community... and contributes to the creation of lifetime neighbourhoods ie places where people are able to live and work in safe and healthy and supportive and inclusive environments with which they are proud to identify” However it is notable that the area profiles, beyond reference to Kew Gardens and Hampton Court, do not identify any of the community and voluntary sector infrastructure that contribute to the health, well-being and sense of place of that area, nor is there a mapping of the community assets that provide community centres and spaces despite the expectation that the local plan “should take local circumstances into account to reflect the character, needs and opportunity of the borough” (4.14) The same is true of demographic and economic profile- most of the information provided in the area profiles is heavily weighted to perpetuating the idea that Richmond is a leafy green borough with the majority of residents employed in highly skilled professional jobs, and with limited economic challenges. However, we know this is not the case, and the pandemic has created a level of instability in socio economic groups not previously seen in services. The pressures on unpaid carers has become much more visible, and the needs of children with Special Educational Needs and their families, particularly in relation to transition into adulthood, including employment and housing are clearly expressed in the SEND Futures Plan https://kr.afcinfo.org.uk/pages/local-offer/information-and-advice/send-consultation-hub-and-resource-bank/send-futures-richmond For there to be a joined-up approach and create opportunities to “improve connectivity and accessibility for all” (page 18) it is essential that developers and town planners from the outset have an accurate and balanced profile of each area which maps the community assets, highlights the demographic and particular age profiles that may be relevant, and is clear in its expectations relating to investment and improvement of the existing infrastructure. Barnes is used as an example below, but in every profile, there are community assets and infrastructure needs that could be highlighted that would inform planning considerations from the outset. 14. Area Profile – Barnes Describes Castelnau “with its fine houses” completely ignores that is an area of relative deprivation with extreme affluence neighbouring poor. The Barnes Fund produced a piece of community research last year which highlights the challenges residents face, and their experience of living there. They feel isolated – limited public transport, no affordable shops within walking distance, the

		<p>ongoing situation with Hammersmith Bridge, lack of services delivered locally. They value community provision such as Castelnau Community Centre, and the Barnes Community Association and highlight the work that OSO Arts Centre did during the pandemic producing and delivering cooked food to those in need across the community. A mixed community of long-term residents and migrant workers, lack of qualifications, many in low paid and unstable work; significant issues with mental health and access to health services. https://thebarnesfund.org.uk/need-in-barnes/</p> <p>Social Value The London Sustainable Development Commission report “How social value can help build back better. A Covid and post Covid approach” (2021) highlights the tangible benefits for local communities of a social value approach, using public bodies’ purchasing power and decision making to increase the benefit to the community by requiring actions and activity that will contribute to growth, employment, resilience and environmental sustainability. These benefits include</p> <ul style="list-style-type: none">• Higher levels of investment in community assets• Inclusion• Improvements to local places, economies and community well being• Avoidance of displacement or community isolation <p>It is essential that the local plan, in recognising the value and contribution of VCS services, and the challenges they face in terms of accommodation and operational delivery, sets out clearly how the leverage that planning allows for can support and strengthen both investment and connectivity across the voluntary and community network.</p>
Heather Mathew, Richmond Council for Voluntary Service (CVS)	3 suggested key areas for inclusion - 3) Community Voice	<p>3) Community Voice</p> <p>A social value approach helps “ identify what’s important to communities now, and why, and the likely impact of changes made to their neighbourhoods” and supports innovative approaches to community co-design of neighbourhoods to enable inclusive place making” (London Sustainable Development Commission) The Mayor of London’s missions for London recovery invites us “ to rethink the way we live and move around the city (4.5 Pg 22) and includes a clear intent “ to work with London’s diverse communities to establish new exciting and experimental uses across London high streets” (4.3 Pg 22) Asset Based Community Development (ABCD) is an approach to sustainable community driven development which would lend itself to the development of the 20-minute neighbourhood. ABCD builds on the assets that are found in the community and mobilizes individuals, associations, and institutions to come together and to realise and develop their strengths</p> <p>(Asset Based Community Development for Local Authorities published by Nesta September 2020 https://www.nesta.org.uk/report/asset-based-community-development-local-authorities/)</p> <p>The Richmond Development Plan currently gives little indication how the community voice will be invited, heard and involved in planning and ongoing community development and there are no suggested measures in the monitoring that will capture social impact of the 20-minute neighbourhoods, the difference it is making in terms of quality of life and the experience of living in Richmond. (pg 319) The plan places great importance, particularly in relation to the green and blue infrastructure, on community education and community stewardship and many of the targets relating to achieving the climate emergency goals rely on engaging residents in conversations that alter behaviours and bring about sustainable change. The plan would benefit from a clear set of expectations in relation to the community voice, engaging with and involving the seldom heard, and encouraging the involvement of young people in neighbourhood development.</p>
Katie Parsons, Historic England	Site Allocations (general)	<p>We have provided comments on certain sites below and we can continue to provide more detail as and when development capacities are assigned to these sites. All of the allocated sites are all developable in principle, it is just a matter of to what extent relative to where the sensitivities lie. It is important that a design-led approach is taken when allocating development capacity to ensure it can be accommodated within a site while avoiding harm to the historic environment in the first instance, or with appropriate mitigation set out in the allocation policies. As advised on the first page of this advice, the allocations could include more detail to reflect the findings of the Urban Design Study.</p> <p>It is also important to ensure that all heritage assets, both designated and non-designated, are identified in allocation policies where relevant. Reference should be made to the need to conserve or enhance such assets and their setting.</p> <p>Throughout all of the allocation policies better reference should be made to archaeology. Many of allocation policies are silent on archaeological issues, how they should be managed, and what information might need to be submitted.</p> <p>The sites listed below will need more intervention and advice from the Greater London Archaeological Advice Service¹ (GLAAS). None of them are potentially significant enough to prevent development or warrant removal from the site allocations list but Desk Based Assessments will be required to inform site capacity, mitigation, and design. These are:</p> <ul style="list-style-type: none">- 10 St Mary’s University, Strawberry Hill- 18 Twickenham Riverside- 20 Kneller Hall- 22 Ham Close- 22 Cassell Hospital- 27 American University, Queens Road- 34 Stag Brewery <p>¹ https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/</p>
	Place-based Strategy for Hampton & Hampton Hill	
Theresa Oddelm, The Royal Parks	Place-based Strategy for Hampton & Hampton Hill – comments specific to biodiversity and the Royal Parks’ Environmental Designations	<p><u>Policy (p35)</u></p> <p>This should include reference to the <u>protection</u> of open space (as well as 'increasing and improving') given the risk to open space associated with increased recreational pressure</p>
Matthew Bolton	Place Based Strategy for Hampton & Hampton Hill	<p>Under place based strategy 6: Hampton, Hanworth Homebase should be added as a potential mixed use residential/ commercial intensification site allocation. This is a retail park site with a large proportion of the site as surface level car parking. As seen elsewhere in the borough (Richmond Homebase) and in neighbouring boroughs (Kingston Homebase and Syon Lane Homebase) there is a clear desire by the landowner of these sites to convert their use to residential.</p> <p>The Local Plan makes no reference to the potential redevelopment of Hanworth Homebase for a residential scheme with affordable housing. The London Plan and Local Plan notes that retail uses should be housed within town centres. This site as an out of town 'big box' retail unit does not add to the vitality of the town centre. It encourages car usage through ample free parking and is located in an unsustainable location further promoting car use. Perhaps the site could be allocated for a mixed use residential scheme with a blend of retail on the ground floor and residential flats above.</p> <p>Also the Molesey Telephone Exchange in Hampton is not allocated as a site. Elsewhere across the borough, the place-based strategies often contain telephone exchanges that may be disposed. This site should also be included.</p> <p>Changes consider necessary: I consider the two above sites should be added to the allocations for the reasons set out above. There is a precedent of similar sites in the borough being included as site allocations yet these have been overlooked in Hampton. Therefore it would add consistency to the councils approach, provide further opportunity for affordable housing on brownfield lane. In the case of Homebase, there is evidence within the borough of residential-led development coming forward in the next three years.</p>

Jon Rowles	6. Hampton & Hampton Hill	<p>The acute shortage of school places is not being addressed and many families who live in Hampton cannot get into local schools and have to send their children to schools far away such as those based in Whitton which can take up to 40 minutes in the morning to reach by bus. Whilst the majority may go by bus, statistics show that around 13% will be making these journeys by car. Therefore, a key element of living locally - local schools - is not being addressed by the council.</p> <p>To meet the demand of school places in the same neighbourhood it looks like the council will need to identify a site for a new secondary school in Hampton near the River Thames and see how existing schools can increase their PANs.</p> <p>Hampton Nurserylands has high levels of social need and the local plan so far hasn't really acknowledged this or put in place a meaningful policy to help these people improve their quality of life.</p>
	Site Allocation 1: Hampton Square, Hampton	
Richard Carr, Transport for London (TfL)	Site Allocation 1: Hampton Square Hampton	<p>The requirement to retain adequate car parking to meet the needs of the community centre and new uses should be modified by stating that car parking should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards.</p>
Andrew Whitehead	Site Allocation 1: Hampton Square, Hampton	<p>I strongly disagree with content in section 6, "Place-based Strategy for Hampton & Hampton Hill" and specifically its sub-section "Allocation 1: Hampton Square, Hampton".</p> <p>The relevant Site Proposal is understandably general in nature: "Partial re-development and improvement for community, retail and local services, employment and residential uses, including affordable units and car parking."</p> <p>This proposal contains an implicit threat to build on the part of the Hampton Square Allocation that's designated as an Other Open Land of Townscape Importance (OOLTI), because building on open green parkland would be cheaper than any alternative.</p> <p>The classification of the OOLTI, of which the Hampton Square Allocation forms the northern part, is documented within the "Other Open Land of Townscape Importance Review", which was carried out by Arup, dated 31/08/2021, and forms page ARUP5. The title of the assessment is "Corner Old Farm Road and The Avenue".</p> <p>This Arup assessment notes that the land in question is a "large green open space with playground", and concludes with a score that's "High against Criteria 1, 2, 3 and 4 and therefore meets criteria strongly."</p> <p>Does it matter if a high-scoring OOLTI is nibbled away? Yes it does. To scores of small children who enjoy the playground daily, and to everybody who appreciates the green lungs it provides between the playground and the houses to its north. This includes all the dog-walkers and residents walking daily to and from the playground and Hampton Square on the footpath that runs through the OOLTI area.</p> <p>The OOLTI should be entirety excluded from any threat of building over in the Site Proposal; it's the only way to prevent developers from building on park land, because brownfield development would be costlier and require more thought than simply concreting over a green space.</p> <p>Changes considered necessary: The Site Proposal should exclude the overlapping area of Hampton Square Allocation with the OOLTI from potential re-development. Either by modified the Proposal's wording, or by redrawing the map of the Hampton Square allocation so there is no overlap with the OOLTI.</p>
Gary Rhoades-Brown	Site Allocation 1: Hampton Square, Hampton	<p>[See comment in relation to Hampton Square proposals]</p>
	Site Allocation 2: Platts Eyot, Hampton	
Kevin Scott, Solve Planning Limited on behalf of Port Hampton Estates Limited	Site Allocation 2: Platt's Eyot, Hampton	<p>This relates to the specific allocation of Platt's Eyot and reflects the existing adopted policy. We are not seeking further revisions to the Site Proposal as we consider it to be a positive framework for regeneration on the island.</p> <p>The supporting context section to this policy recognises the impact of the fire in May 2021 and states: <i>'In May 2021 there was a large fire which destroyed several buildings on the island and caused further deterioration of the Conservation Area. The Council is seeking reinstatement of the listed buildings as they were before the fire'</i></p> <p>The owners are working with the Council on proposals which will involve the reinstatement of the listed buildings. However, we would suggest that a requirement to reinstate the listed buildings as they were before the fire could be reworded. The buildings were in need of repair and refurbishment prior to the fire. We would suggest the following amendment: <i>'In May 2021 there was a large fire which destroyed several buildings on the island and caused further deterioration of the Conservation Area. The Council is seeking reinstatement of the listed buildings through an appropriate scheme of restoration.'</i></p>
George Goodby, Environment Agency	Site Allocation 2: Platts Eyot, Hampton & Hampton Hill	<p>The local plan describes potential residential use to assist with viability for regeneration of listed buildings following fires in 2021. The sequential test report dated December 2021 describes this site as less vulnerable. We assume therefore that the allocation will be less vulnerable and any more vulnerable development that may come forward in future will not be subject to the allocation and will be windfall subject to applying relevant sequential and exception tests. If the allocation is to include some minor residential use then the sequential testing should be updated to reflect this.</p> <p>Recommended action: clarify whether the sequential test has included the 'more vulnerable' residential use or whether it needs to be re-assessed for this use.</p> <p>The Sequential test report states that 20.3% of the island is shown to be within the 5% flood designated as functional floodplain. Any new development whether less or more vulnerable should be assigned to undeveloped land outside of this zone or contained within existing built footprint (developed footprint) shown to be within 5% flood. We recommend that you make this clear within the site allocation. For example, you could add to the fifth context bullet point 'They should not prejudice the continued operation of existing river-dependent and river-related uses and must comply with relevant flood risk policy'.</p> <p>Recommended action: We recommend you reiterate that any development must comply with flood risk policy.</p> <p>Bullet points 6 and 7 propose limited vehicle access to Platts Eyot Island. Any access arrangements must not result in a loss of riparian habitat or flood storage, or a loss in the ability to maintain flood defence assets. This should be added to bullet point 7 for clarity.</p> <p>The wording could read 'The Council will work closely with the Environment Agency to understand the issues relating to the provision of safe access / egress to and from the island, including ensuring flood defence maintenance access is maintained or improved, and to ensure there is no net loss of riparian habitat or flood storage'.</p> <p>Recommended action: We recommend you update context bullet point seven to clarify that access and egress works must not impact flood defence maintenance access or result in a loss of riparian habitat or flood storage.</p> <p>[See also comment on paragraph 16.63]</p>
Suzanne Parkes, Elmbridge Borough Council	Site Allocation 2: Platts Eyot, Hampton - River Thames development	<p>The boundary between Richmond and Elmbridge is separated by the River Thames. In the consultation document, Chapter 6 'Place-based Strategy for Hampton & Hampton Hill', there are proposals for several site allocations along our shared boundary. Site allocation 2, 'Platts Eyot', is an island on the River Thames proposed for regeneration for new businesses and industrial uses including residential development, should it complement and enhance the island.</p>

		In EBC’s Strategic Flood Risk Assessment Level 1 (2019) property areas in Elmbridge are outlined around Platts Eyot as Flood Warning Areas. Therefore, caution should be given to any intensification which could otherwise increase flood risk and impact flow routes of the functional floodplain. There is no capacity details or clear timescales for delivery / implementation which requires clarification.
	Site Allocation 3: Hampton Traffic Unit, 60-68 Station Road, Hampton	
David Wilson, Thames Water	Hampton Traffic Unit, 60-68 Station Road, Hampton	<p>Thames Water Site ID: 62517</p> <p>Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments As this is a brownfield site, there may be public sewers crossing or close to the development. If you discover a sewer, it's important that you minimize the risk of damage. We’ll need to check that the development doesn’t limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes. The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. “No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.” Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes.</p>
Vicky Phillips, Habitats & Heritage	Site Allocation 3: Hampton Traffic Unit, 60-68 Station Road, Hampton p40	We support a link through to the Beveree site and would seek a contribution to improving the management, maintenance and biodiversity of this site which is currently an uneasy mix of football pitch, overflow parking and woodland/open meadow designated for nature conservation (SINC known as Ormond Bank and managed as a site for nature conservation by the LB Richmond Parks Department.) We have worked with community groups on this site in the past.
	Site Allocation 4: Hampton Delivery Office, Rosehill, Hampton - no comments received	
	Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton	
Theresa Oddelm, The Royal Parks	Site Allocation 5: Car park for Sainsburys, Uxbridge Road, Hampton (p44) – comments specific to biodiversity and the Royal Parks’ Environmental Designations	We welcome recognition of potential impacts on the Longford River and the requirement to enhance.
Richard Carr, Transport for London (TfL)	Site Allocation 5: Car park for Sainsburys, Uxbridge Road, Hampton	<p>Bus services in both directions serve a bus stop on this site that is alongside the existing store. The site allocation should make it clear that the bus stop must be retained in any redevelopment. The statement that parking is expected to be re-provided for the adjacent food store should be modified by stating that car parking should be minimised as part of any redevelopment consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards. London Plan Policy T6 states that ‘<i>Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London</i>’.</p> <p>We note that the existing petrol filling station is expected to be retained or re-provided. London Plan Policy T6 states that ‘<i>New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities</i>’.</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton	We note that the Car park site for Sainsbury’s, Uxbridge Road, Hampton (Site Allocation 5) is proposed to be released from Metropolitan Open Land status and has potential for affordable housing. If this site comes forward for development, it may generate the need for investment in healthcare infrastructure in the area.
Vicky Phillips, Habitats & Heritage	Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton p44	We are concerned about releasing this site entirely from MOL as it is an important potential green corridor site between the Longford River and the Sites of Borough Importance for Nature Conservation at Twickenham and Fulwell golf courses on the other side of Uxbridge Road. There are existing lines of greenery and trees, although the MOL is largely hard-surfacing at present. Given the vision for new affordable housing with additional public open space on part of the site which mentions the restoration of the Longford River wildlife corridor, we would like to see part of it retained as MOL until a final development plan is agreed and then the relevant green parts of the site should be kept as MOL.
Anna Stott, WSP on behalf of Sainsbury’s	Site Allocation 5 - Carpark for Sainsbury's St Clare's Superstore, Uxbridge Road, Hampton	<p>On behalf of our client, Sainsbury’s Supermarkets Ltd (SSL), we make this submission in response to the current consultation in respect of the Draft Local Plan: Pre-Publication version (Regulation 18) which has been prepared by the Council.</p> <p>Sainsbury’s operate a number of stores within the Borough two of which are the focus of these representations as they comprise emerging site allocations; the St Clare’s Superstore (Site Allocation 5) and the Richmond Superstore (Site Allocation 29).</p> <p>Both stores are important assets to the local community and provide many jobs for local people. Although we are generally supportive of the proposed allocations, there are key matters that are detailed later in these representations which make the Plan unsound and must be reconciled in any future versions of the emerging Plan. We explain our concerns further below.</p> <p>Draft Allocation 5 – Carpark for Sainsbury’s St Clare’s Superstore, Uxbridge Road, Hampton</p> <p>The site is currently used as car parking and a Petrol Filling Station (PFS) for the adjacent Sainsbury’s superstore. Despite these uses on the site, it is currently designated as Metropolitan Open Land (MOL).</p>

		<p>The site is proposed to be released from MOL as part of the Draft Local Plan proposals (Policy 35) because it is a commercial site and clearly serves no genuine MOL function. The Council’s Metropolitan Open Land Review (2021) acknowledges this.</p> <p>The draft allocation identifies the site for development to provide 100% affordable housing, restoration of the Longford River wildlife corridor, 20% Biodiversity Net Gain and reprovision of the car parking for the foodstore and the PFS.</p> <p>The proposed removal of the site from MOL and the reprovision of the PFS and car parking would be supported by Sainsbury’s. However, the proposal to allocate the site for 100% affordable housing is simply not justified and the allocation should be amended to remove the reference to residential tenure. Other policies will indicate the amount of affordable housing that is expected to be delivered from the site, and the tenure mix will be subject to viability.</p> <p>The draft allocation states that “the exceptional circumstances” justifying the MOL release are set out under Policy 11 to meet the identified affordable housing needs of local residents and therefore any future development scheme coming forward for this site should deliver 100% on-site affordable housing. In short, the drafting states that the development of the site for affordable housing is the exceptional circumstance justifying the site’s removal from MOL. This is not correct. The exceptional circumstances which allow the site’s removal from MOL is the fact that it is a foodstore car park and PFS. The site’s designation is a historical quirk that needs to be rectified.</p> <p>The potential tenure of the residential units has nothing to do with the exceptional circumstances justifying removal from MOL and the reference should be removed. Although “limited affordable housing” is one of the exceptions set out under paragraph 149 of the NPPF (2021) when considering inappropriate development in the Green Belt, the site would no longer be designated Page 3 as MOL and so there would be no need to restrict development to that considered acceptable in paragraph 149 of the NPPF.</p> <p>Unless these changes are made to the draft allocation, the Plan will be unsound and Sainsbury’s cannot support the allocation.</p> <p>We are also concerned that requiring 20% Biodiversity Net Gain (BNG) will be unfeasible. This requirement comes from Policy 39 which seeks 20% BNG. This is <u>twice</u> the requirement sought through the Environment Act 2021. For this reason, Policy 39 is unsound and should be amended to reflect the requirements of the Environment Act. The allocation should also be amended to refer to 10% BNG.</p> <p>[See comment in relation to Site Allocation 29 and Summary including all the changes considered necessary]</p>
Gary Rhoades-Brown	Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton	[See comment in relation to car parking on the site]
	Place-based Strategy for Teddington & Hampton Wick	
Graeme Fraser-Watson, The Teddington Society (Planning Group)	Section 7 Place-based Strategy for Teddington & Hampton Wick	<p>We believe that the draft local plan does a good job in recognising that Teddington is an attractive place to live in and work in and that efforts must be made to maintain and improve its attractiveness. We are pleased to see that it is recognised that Teddington, with its uniform street patterns, consistent building quality, and consistency in scale and height of existing buildings and prevalent green infrastructure has a high sensitivity to change. We applaud the strategy to conserve and enhance the town’s centre’s character and function and to take opportunities within the borough to improve design, deliver beautiful buildings and to ensure developments make a positive contribution to greening the borough’s streets, buildings and open spaces.</p> <p>We would like you to take into account our views on the following:</p> <p>- Mid Rise buildings (Section 7: Place-based Strategy for Teddington & Hampton Wick) We are very concerned that "along the railway line north of Teddington Station" is being designated a Mid-Rise Zone. We believe that this is totally inappropriate. We believe there should be NO Mid-Rise or Tall-Building Zones in Teddington.</p> <p>You admit that the borough is characterised by primarily low to medium rise buildings which has produced very attractive townscapes and is important to the borough’s distinctive character. We have examples in Teddington (notably Harlequin House and the Travelodge) which are right in the centre of Teddington and are quite out of keeping with the surrounding area and buildings. These were clearly mistakes of the past and, in support of maintaining and improving the attractiveness of Teddington, it is important that such mistakes are not compounded by inappropriate new developments.</p> <p>To designate an area as a Mid-Rise zone will only encourage developers to assume that they can build 5/6 storey buildings in this area – which may be entirely inappropriate. To not have a mid-rise zone in Teddington does not mean that mid-rise buildings cannot be considered in Teddington. They may still be considered, as the draft local plan says, in areas that are not designated as Mid-Rise zones. We are not against 5/6 storey buildings being considered in appropriate settings but we are against the assumption that buildings in a particular zone should be 5/6 storeys high. By creating a Mid-Rise zone this is exactly what will happen.</p> <p>We consider that the areas near Teddington Station that are now industrial sites should remain as such to enable local employment. We support the designation of Teddington Business Park, Station Road as a Locally Significant Industrial Site (LSIS) (section 19.40) and that Policy 24 includes "there is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused".</p> <p>Changes considered necessary: See comments above. Most important is that any reference to a Mid-Rise Zone within Teddington should be deleted from the Plan.</p>
Theresa Oddelm, The Royal Parks	Place-based Strategy for Teddington & Hampton Wick	<p>This is particularly relevant as it refers directly to Bushy Park. Specifically, an employment site is proposed on the edge of Bushy Park and three incremental intensification zones overlap with the Park. Whilst we agree with the inclusion of Bushy Park within the vision for Teddington and Hampton Wick, we would encourage the inclusion of specific mention of Bushy Park within the policy for future development to ensure that it is specifically considered when improving and creating connections between open spaces. We would emphasise that we would like to be involved further on in the plan process to ensure that any development around the Park is carried out with due care and consideration for it.</p>
Theresa Oddelm, The Royal Parks	Place-based Strategy for Teddington & Hampton Wick – comments specific to biodiversity and the Royal Parks’ Environmental Designations	<p><u>Policy (page 48)</u></p> <p>Future development plans should include reference to the <u>protection</u> of open space (as well as ‘increasing and improving’) given the risk to open space associated with increased recreational pressure</p>
Robert Blakebrough	Section 7 Place Based Strategy - Teddington and Hampton Wick <i>(this point also made on response form against the place-based strategies)</i>	<p>I do not see why ratepayers/tapayers should subsidise so called affordable housing for those who cannot afford to live in Teddington. Why should a place we have worked hard and struggled to afford to live in and have had to pay the full cost to be lived in, be devalued ? if someone cannot afford the property prices they should go somewhere they can afford. Section 7 Place-based strategy Teddington & Hampton Wick; and Policy 11 Affordable Housing (Strategic Policy).</p> <p>There is no mention of Eleray Hall in Middle Lane, Teddington, which, contrary to Section 16 (Responding to the Climate Emergency and Taking Action), and in the face of strong local opposition is proposed for demolition and re-build instead of refurbishment. See Section 7 Place Based Strategy Teddington and Hampton Wick; See Section 16 A and 16 B.3</p> <p>Changes considered necessary: No more affordable/social housing in Teddington and Hampton Wick. I cannot afford to live in Belgravia, therefore I do not live in Belgravia No more hideous mid-rise in Teddington and Hampton Wick such as the Travelodge on Station Road Teddington.-self evident eyesore</p>
	Site Allocation 6: Telephone Exchange, Teddington	

David Wilson, Thames Water	SA5 Telephone Exchange, High Street, Teddington	Thames Water Site ID: 49784 (Reviewed Jan18) Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Additional Comments With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Site ID: 49785
Vicky Phillips, Habitats & Heritage	Site Allocation 6: Telephone Exchange, Teddington p50	The green space in front of this building is a wildflower area (with scope for improvement) which has a particularly good display in spring and should be retained and developed as a local green hub if possible.
	Site Allocation 7: Teddington Delivery Office, Teddington	
David Wilson, Thames Water	SA7 Strathmore Centre, Strathmore Road, Teddington	Thames Water Site ID: 49785 (Reviewed May 21) Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Additional Comments With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. “The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide ‘working near our assets’ to ensure your workings are in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.
	Site Allocation 8: Strathmore Centre, Strathmore Road, Teddington	
Sue Clayton Smith	Draft Local Plan Pages 14-28 . Place based strategy 53-57. Site allocation 58-61 14 Mereway Day Centre	Site Allocation 14 - Mereway Day Centre P58-61 Disagree. I object to the redevelopment for a social or community infrastructure here because this is adjacent to a high density area of tightly packed roads where traffic and parking is already congested. Additional traffic would have a detrimental affect on the area. There is already a dangerous junction at Gould Road/Mereway Road, which would be worse with increased traffic. I also strongly object to the suggestion that if a use could not be found for a social or community infrastructure use it could be dedicated to 100% affordable housing for the same reason. Creation of flats or houses and their attendant increase in traffic would significantly increase the traffic/parking congestion. A significant amount of money is being spent on creating a fish pass adjacent to this site so in my view the best use would be to add this space to the Kneller Gardens/Mereway Nature Reserve, which would increase green space for residents in what is already a popular area.
	Site Allocation 9: Teddington Police Station, Park Road, Teddington	
Nicholas Grundy (responding as partners at Park Road Surgery)	Draft Local Plan: Site Allocation 9	We are responding as the partners at Park Road Surgery in Teddington, specifically to Site Allocation 9 (Teddington Police Station). We are an NHS GP surgery which looks after just over 13,000 patients across a catchment area which includes the Teddington ward and part or all of the five neighbouring wards of Fulwell & Hampton Hill, Hampton, Hampton Wick, South Twickenham, and West Twickenham. Our existing premises is a converted Victorian house which should let us look after about 3,400 patients, meaning we are accommodating about 10,000 more patients than the building should; this is the highest number of excess patients for any surgery in the borough, and our urgent need to move premises is recognised in that we are top priority in the Richmond CCG Estates Strategy. We would therefore ask that Site Allocation 9 specifies that this medical need must be met as part of any redevelopment of the Police Station, in line with the existing text which says that “proposed redevelopment of the site will only be acceptable if a community/social infrastructure use is reprovided on site at ground floor level, such as for a medical/health use.” While this wording is welcome, in other parts of Richmond sites have been redeveloped ostensibly to provide medical facilities without the necessary agreements from the surgeries themselves or the CCG – for instance, the 2014 permission on the old Dairy Crest site on Orchard road in Kew included a 1,090m2 “GP surgery” which was still empty, and being marketed as retail space, 5 years later. The Teddington Police Station is too important a site for this to happen, and any planning consent should specify that the need outlined in the Local Plan and the CCG Estates Strategy is met, and make sale or lease of any residential units conditional on the occupation of the GP space. We also call for the site allocation to be more specific about the need for a co-located health and social care facility, combining our need with space for local charities and a shared community space for health and wellbeing. This matters because the Teddington Police Station is a large community asset in the centre of Teddington, and because ongoing residential development without corresponding healthcare development increases the pressures GP surgeries are under, and worsen the service available to patients. Park Road Surgery’s existing building is operating at capacity all the time, with nowhere

		<p>physically to put more staff to answer the phones or to see patients, nor to cope with spikes in demand like winter pressures. Physical access is terrible, particularly for those with buggies, or mobility difficulties, and half the consulting rooms are on the first floor.</p> <p>The increased pressure on appointments makes it harder to offer continuity of care, and longer waits have knock-on effects on walk-in and A&E services. We work hard to mitigate these factors, but we are at the limit of what we're able to do where we are.</p> <p>We have been in discussions with the CCG and NHS England over new premises since 2010, having looked at numerous sites over that time. Securing a new surgery on this site would:</p> <ul style="list-style-type: none">• significantly improve local residents’ access to healthcare• support national policy, in particular the aims set out in the NHS Long-Term Plan to move care out of hospital and into the community• support the Teddington Village Plan• improve disabled access• support the strategic aim for social and community infrastructure and “flexible spaces[...]as part of multi-purpose assets” (“Securing new social and community infrastructure”, draft Local Plan) <p>We wholeheartedly support the proposals in the draft Site Allocations, but would ask that they are strengthened as above to ensure the site continues to be an asset for Teddington in years to come.</p>
Emma Nicholls, Park Road Surgery on behalf of patients	Draft Local Plan: Site Allocation 9	<p>[The Practice Manager at the Surgery indicated a few respondents were unable to submit their comments online (F A Row Botham, M Landau, M Osorio, and three unnamed respondents. Details as follows]</p> <p>We have been contacted by a few patients, registered at this surgery, who wanted to make comments on the local plan and have been unable to submit their comments through the online form. They want to support the practice's request that there is a planning requirement on the Teddington police station site that there must remain a provision for healthcare and community use.</p> <p>F. A. ROWBOTHAM: Section 7. Site Allocation 9. Teddington Police Station and The Park Road Surgery website. As encouraged by the Park Road Surgery, 37 Park Road, Teddington, Middlesex, TW11 ... as a Patient and as a nearby Resident (rather elderly) I have tried very hard to make the relevant comments about the Teddington Police Station, which needs to be sent in by Today. I completed your relevant Form, Section 7. Site Allocation 9., but was unable to master how to Email it to yourselves. Therefore I am trying to do it this way. Could you please register on the suggested relevant Planning Forms that I wish to support The Park Road Surgery, Teddington, in their website comments? [See also comment from F A Rowbotham]</p> <p>M Landau: Unable to put my comments on the website. I think the police Station would be an ideal location for the surgery to move to. Bigger premises to deal with ever growing population of Teddington. It benefits the community. Have parking facilities for both medical staff and patients. Much better than having more housing without parking facilities !! Richmond council should agree your application. Good luck you will need it</p> <p>M Osorio: Dear Park Road Surgery I totally and wholeheartedly support the proposal to move the Surgery to The Police station site. I have been pressing for this for years and have spoken many times to local counsellors on this proposal. It is CENTRAL, ACCESSIBLE, AND NEAR ALL PUBLIC TRANSPORT WITH SPACE FOR PAR@R PARKING. IDEAL FOR PEOPLE ON THEIR WAY TO PR FROM WORK etc etc GOOD LUCK</p> <p>Unnamed recipient: I support the petition to relocate the Park Road Surgery to Teddington Police Station which I believe in an appropriate transition to larger landmark building. This is a timely move considering the current Covid-19 required policies in place to its spread. When move is finalised I will consider returning my care the surgery along with the rest of my family who are still registered at the surgery. Thank you for the opportunity to comment</p> <p>Unnamed recipient: I support park road surgery teddington in their application request to take over premises at teddington police station from a patient of said surgery</p> <p>Unnamed recipient: I think it would be an excellent idea as it would give the staff far more room which in turn would enhance facilities plus for patients</p>
Angela Appleby	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>– Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment</p> <p>– Any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery</p>
Ben Ayliffe	Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the strategic vision, and the place-based strategies</i>)	<p>“I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <p>– the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment</p> <p>– any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”</p>
Sarah Ball	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <p>– the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment</p> <p>– any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.</p>
Robin Sinclair	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>Comment on site allocation 9, Teddington Police Station :</p> <p>Can I request that :</p> <p>– the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment</p> <p>– any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.</p>
Leah Regel	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <p>- the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment</p> <p>- any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery</p>

Edward Cummings	Section 7 of the plan, site allocation 9, Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that: - the local Plan requires my local GP surgery, Park Road Surgery, to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. Thank you
Alan Brocklehurst	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	"I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."
EE McClelland	Place Based Strategy - Teddington - Police Station Site on Park Road	I would like to express my support for redevelopment of the police station in Teddington for a health centre - the existing surgery in Park Road is cramped and aging building not particularly well suited (especially the stairs) for access with babies, older people and the sick generally.
Emma Nicholls	Section 7, Site Allocation 9, Teddington Police Station (<i>this point also made against the place-based strategies</i>)	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. I support Park Road Surgery’s need to move to new premises, in order to improve healthcare provision locally and to give the opportunity to extend health and well-being services to have the space to work together. This would be a much better use of the Police Station site than more housing units.
Charles Griffiths	Section 7, Site Allocation 9, Teddington Police Station	I am commenting on site allocation 9, Teddington police station, to ask that the local plan requires that Park Road surgery gets relocated there as part of any re-development - any planning consent makes the sale or lease of residential units conditional on the occupation of the GP surgery.
Christopher Loughton	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I refer on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Clair O'Brien-White	Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the strategic vision</i>)	I am commenting on site allocation 9 Teddington Police Station, to ask that; the local plan requires Park Road Surgery to be relocated there as part of any redevelopment. Any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. This would allow the surgery to expand it services to serve the population it serves in the most effective way.
Danielle Cantillon	Section 7, Site Allocation 9, Teddington Police Station	I am commenting on section 7, site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment as their current premises is no longer fit for purpose. This is badly needed for the community – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Alison Thomson	Section 7, Site Allocation 9, Teddington Police Station	I am commenting on site allocation 9, Teddington police station. I ask that the Local plan requires Park Road Surgery to be relocated there as part of any redevelopment. Any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. Park Road Surgery is a vital part of our community but has outgrown its space and must be part of this redevelopment.
John Coleman	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Nuala Orton	Section 7, Site Allocation 9, Teddington Police Station (<i>this point also made on response form against the strategic vision, strategic objectives, and the place-based strategies</i>)	I am commenting on Section 7, Site Allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Mark Lawson	Section 7, specifically Site Allocation 9, Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, strongly requesting that: – the Local Plan requires Park Road Surgery to be relocated within the above building as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. As I enter my 60s this year, battling [personal health condition details removed for data protection] , I am alarmed that the surgery’s current premises is 10k over-capacity with more on the way. My doctors there provide me with an excellent service, as well as the nurse who administers my blood tests, and I would like their premises to reflect their expertise & professionalism in the larger building across the road.
Margaret Loughton	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I refer to site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Kerem Eryavuz	Section 7, Site Allocation 9, Teddington Police Station	"I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."
Matthew Casson	Section 7, Site Allocation 9, Teddington Police Station (<i>this point also made on response form against the strategic vision</i>)	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Alison Parkes	Section 7, Site Allocation 9, Teddington Police Station (<i>this point also made on response form against the place-based strategies</i>)	I would like to comment of Section 7, Site Allocation 9, Teddington Police Station. It is already suggested that this site may be suitable for housing and/or community medical service. Park Road surgery currently operates in a very limited space created from a Victorian house. Despite the fact that this is not ideal surroundings, it provides an extremely valuable role within the community. As a registered patient at the surgery, I know it deserves a better space to continue to serve the community well into the 21st century. I would particularly request that: - the Local Plan requires Park Road Surgery to be relocated there as part of ANY redevelopment, - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Jessica King	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Susan Park	Section 7 / Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Stephanie Saul	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	"I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."

Paul Sanders	Section 7 / Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police station, to ask that ; - the local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. It's a well run surgery and badly needs more space and the location being so near, will not change the demographics of existing patients or impinge on other surgeries in Teddington.
Lesley Forster	Relating to para 7 re Teddington and Hampton Wick	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Anthony Langridge	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	My response relates to Section 7, Teddington Police Station and I firmly believe that Park Road Surgery be relocated within the proposal for Social Housing as part of any redevelopment and that any planning consent makes the sale or lease of any residential units conditional on the occupation of Park Road Surgery. Adopting this would move me to an "Agree" position.
Andy Collier	Section 7, Site Allocation 9, Teddington Police Station (<i>this point also made on response form against the place-based strategies</i>).	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Yvonne Hooker	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	The Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment
Tracey Costard	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Simon Redding	Site Allocation 9: Teddington Police Station, Park Road, Teddington	“ am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Steve Rigge	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as an essential part of any redevelopment plan – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Daniel England	Section 7, Site Allocation 9, Teddington Police Station (<i>this point also made on response form against the strategic vision, strategic objectives, Policies 1 and 2, and the place-based strategies</i>)	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Melissa Hallan	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Richard Hooker	Section 7 (Teddington and Hampton Wick), Site Allocation Teddington Police Station etc.	I suggest that the Local Plan provides for the Park Road Surgery to be relocated to the police station site as part of any redevelppmment
Elizabeth Honer	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Anna McGeoghegan	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9. Teddington Police Station to ask that the local Plan requires Park Road surgery to be relocated there as part of the redevelopment - any planning consent makes the sale of lease of any residential units conditional on the occupation of the GP surgery.
Tara Munday	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery
Hannah Oneill	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Audrey Rigge	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as an essential part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Jonathan Wax	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station. We need a defined, certain plan for Park Road Surgery. Therefore I believe that: 1. The Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment. 2. Any planning consent makes the sale or lease of any residential units conditional on the occupation of the by the GP surgery currently sited opposite, known as Park Road Surgery.
Nicholas Carpenter	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Corinna Durocher	I am responding to section 7 of the plan, specifically Site Allocation 9. (<i>this point also made on response form against the place-based strategies</i>)	My comments refer to section 7 of the plan,specifically site allocation 9, Teddington Police Station. I'd like to ask that, for the benefit of all of us living in the area, the Local Plan requires that Park Road Surgery be relocated there as part of any redevelopment project - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. Thanks.
Carol Morey	Section 7, Site Allocation 9, Teddington Police Station	Please can the Local Plan require Park Road Surgery to be relocated to the Teddington Police Station site as part of any development of the site. Planning consent should be conditional on the relocation of the GP surgery, and the new building should be no taller than the current police station.
Benjamin John	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	With regard to Teddington Police Station (9) I agree to the proposals and would like to register my opinion that a move from the present location of the GP surgery at Park Rd to be included in any plan for the repurposing of Teddington GP Practice

Sandra Worth	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Adrian Mullen	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Alison Campbell	7 Teddington area and Site allocation 9 Old police station.	I strongly agree this should be for community use especially a relocating of the nearby GP centre, other community needs and some really affordable housing. The site should be redeveloped as a whole within the 1-5 year period. It should not be sold to a private developer.
Ursula Armstrong	Site Allocation 9: Teddington Police Station, Park Road, Teddington <i>(this point also made on response form against the strategic objectives, Policies 1 and 2, and the place-based strategies)</i>	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Irene Iwunze	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Jonathan Price	Site Allocation 9: Teddington Police Station, Park Road, Teddington	We strongly support and encourage that Park Road Surgery be relocated to the site currently known as Teddington Police Station. That the site is just across the road from the surgery's current location is ideal - this will ensure the minimum amount of disruption to all those who use the surgery, health care workers and patients, for it staying close to the train station, many bus stops, the pharmacy on Park Road and with Boots, also so close by on Broad Street. So as to make the best use of the building for the community - both in terms of health care and housing - we would ask that any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. We can think of no better use for this building.
N'Yasha Bailey	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington <i>(this point also made on response form against the place-based strategies)</i>	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery
Deborah Waddon	I am commenting on Section 7 of the plan, site allocation 9, Teddington Police Station	I am in favour of this property being developed into affordable housing to rent or buy and hope priority will be given to residents that are residing within their family homes they have grown up in inside the borough and to others that are wishing to remain in this locality to be able to afford housing on lower incomes. Also I am in total favour of this property having an allocation within the ground floor to house The Park Road Surgery which is in desperate need of new premises to alleviate the pressure it is under caring for the local population and to which it offers a first class service. I am exceptionally fortunate to be able to live in this wonderful part of our borough and would like my children to be able to do so also and that as a family of different generations we can work together and support each other within the family unit i.e. i am a grandmother and would like to be able to offer help to my younger family assisting with childcare to enable them to work and contribute to the economy. Also as a widow it would be a great comfort to me knowing I have the support of my family close by.
Moira Welch	Section 7 of the Plan Site allocation 9	I am commenting on site allocation 9, Teddington Police Station, to ask that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery
Sarah Phillips	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery
Celia Till	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I agree with the statement that "redevelopment of the Teddington Police Station site will only be acceptable if a community/ social infrastructure use is reprovided on the site at ground floor level, such as for a medical/health use". Specifically, I ask that the Local Plan requires Park Road Surgery to be relocated there, and any planning consent for residential units to be conditional on this.
Liz Baran	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	Apart from this website being extremely difficult to navigate (is that to ensure no one bothers to object to anything?) I am commenting on site allocation 9, Teddington Policy Station to ask that: 1) The Local Plan requires Park Road Surgery to be relocated there as part of any development 2) Any Planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery
@PP	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Winifred McGee	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that:-the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment-anyplanning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Matthew Doughty	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Vicky Phillips, Habitats & Heritage	Site Allocation 9: Teddington Police Station, Park Road, Teddington p65	We agree with the need to retain the existing green triangle to the north and open it up to the public as a pocket park. We support the provision of a doctor’s surgery on the ground floor and think that there is room for additional green space to be provided on site as a garden for patients and those living in the affordable housing. Presumably this is a building which the Council would like to see refurbished rather than demolished in accordance with Policy 3B para 3?
Ina Stradins	Section 7, Site Allocation 9, Teddington Police Station	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Steve Honeybourne	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment and any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Judie Cole	Site Allocation 9: Teddington Police Station, Park Road, Teddington	Teddington Police Station for Park Road Surgery relocation. I most certainly wish to support this relocation: the current excellent surgery needs modernising and more space has to be found. It is a popular local surgery which local residents are very satisfied with and does its duties superbly to keep all healthy and safe as far as possible.

Terence Hirst	Section 7, Site Allocation 9, Teddington Police Station	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Site Allocation 9: Teddington Police Station, Park Road, Teddington	We note that within the town centre boundary, there is potential for new development at key sites, including Teddington Police Station (Site Allocation 9). We support the site proposal for community/social infrastructure led mixed use development with an element of residential. This could include healthcare/medical use as Park Road Surgery are keen to explore this option to move to new premises.
Charles Titcombe	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
John McCarthy	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Anna Kendall	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Douglas Craik	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the place-based strategies</i>)	With respect to site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - that in this case priority be given to use of the ground floor level allowing step-free access – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Christine Craik	Site Allocation 9: Teddington Police Station, Park Road, Teddington	With respect to site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - that in this case priority be given to easy access for less mobile patients – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Moya Meredith Smith	Site Allocation 9: Teddington Police Station, Park Road, Teddington	Yes essential to go ahead ASAP for move of Park Road surgery and Health Centre to Site of Old Police Station, especially as all other sites turned down over the last few years. Ideal site for parking, access and ambience, couldn’t find a better place for this very active and you to date practice. Easy access for all patients and still ear to station for those who work in London or other. I very strongly approve of the plan associated with some residentAl accommodation, like flats for the elderly etc
Conor Mulhern	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I have been resident in Teddington for just over 20 years, and one of the key resources for me the GP Surgery located on Park Road in Teddington. I have been aware for some time that the Surgery is struggling to find a new location and I have recently become aware that there may be the possibility of using the current site of Teddington Police station as a new location for the Surgery. From the perspective of serving the local community I can think of few better uses for the site of Teddington Police station than providing a new location for Park Road surgery. The Police station is just across the road from the Surgery’s current location which has significant advantages in terms of continuity of service and the potential to build a modern purpose built premises. For those reasons I strongly believe the council’s local plan should support the relocation of Park Road Surgery to the site currently used by Teddington Police station, and that any planning permission granted to the site should be conditional on the Surgery moving to that site.
James Tullo	I am commenting on site allocation 9, Teddington Police Station within Section 7	In order that Richmond's overall strategic objectives are supported there needs to be good provision of health care. Currently the limitations of Park Road Surgery's accommodation prevents this. To achieve that I believe the Local Plan should require Park Road Surgery to be relocated to the Teddington Police Station site as part of any redevelopment. To ensure that happens any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Sebastien Thelu	Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the place-based strategies</i>)	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery
Peter Heighes	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Colin Clode	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on section 7 of the plan Site allocation 9 Teddington Police Station to ask that the local plan requires Park Road Surgery to be relocated there as part of any redevelopment.
Neroli Tullo	I am commenting on site allocation 9, Teddington Police Station.	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan should require Park Road Surgery to be relocated there as part of any redevelopment; this location is directly opposite the current premises and is much needed – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Michael Massey	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Rod Cowan	Paragraph 7.1, Site Allocation 9, Teddington Police Station, Park Road, Teddington	I request that - The Local Plan makes it a requirement that the existing Park Road Surgery is relocated to the site as part of any redevelopment, and - Planning consent makes the sale/lease of any residential units conditional upon the occupation of the GP Surgery.
Marrin Dawson	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment as the current facilities are inadequate and not fit for purpose – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Sue Kidger	Paragraph 7.1, Site Allocation 9, Teddington Police Station, Park Road, Teddington	I request that - The Local Plan requires that the existing Park Road Surgery is relocated to the site as part of any redevelopment, and - Planning consent makes the sale/lease of any residential units conditional upon the occupation of the GP Surgery.
Mrs D Hudson	Site Allocation 9: Teddington Police Station, Park Road, Teddington	Due to the confines of their current premises in a house in Park Road and currently the gross lack of parking I am an advocate of them moving to the Teddington Police Station site in order they can improve on their services offered and it takes a busy Surgrey off of a pretty Residential Road

Gerald Rowe	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	Any planning consent makes the sale or lease of any residential units conditional upon a new GP Surgery to be established on the site.
Magda Rabenda	Site Allocation 9: Teddington Police Station, Park Road, Teddington	As a local resident and patient of Park Road GP Surgery Teddington. It is incredibly important that our surgery secures a site Please take note. "I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."
Alan Roderick	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. – the Local Plan requires Park Road Surgery to be relocated to location on Park Road or to the east of it for the convenience of existing patients rather than moved to the Eastern End of Teddington
Stephen Croft	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I have been a patient at The Park Road Surgery opposite this site for more than 60 years and have seen the many changes in GP surgeries and the increasing demands on both the staff and premises. The current premises are unfit for purpose to meet these needs and those of it's patients. The surgery will have to move to meet the increasing demands on GP practices and the needs of it's patients, especially those with limited mobility and other additional needs. There are very few possible sites available in the area. I am aware that St Mary's hospital sports grounds site in Teddington was being considered but this is not so well served by public transport and is not as centrally located as the current premises nor as near to local long established pharmacies. The large site opposite, the former police station, was used by and for the protection of the local community. A significant part of the site should continue to be used for these purposes by relocating The Park Road surgery there. Such use of the site would meet the key policies and strategies of the Council. It is a central location well served by public transport and within walking or cycling distance for most of it's patients. Changes considered necessary: For the reasons given in 10 above and to comply with the Council's own policies and strategies:- Site 9 under paragraph 7 of the Place-based Strategy of the Local Plan should include the requirement for the relocation of The Park Road surgery to the site as part of any redevelopment. To ensure compliance with this, any planning consent granted must be conditional on the relocation of The Park Road surgery to the site with appropriate premises, ancillary services and amenities before any residential, commercial or other premises on the site are sold, leased or licensed for occupation.
Robin Legard	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am answering this consultation as a long term patient of the Park Road Surgery. The current premises have been unfit for purpose since I have been attending the practice. What is needed is a much bigger premises which will allow such a large practice to provide the quality of care and range of services to its patients, including those with disabilities who must find it incredibly difficult to negotiate. The current location, in central Teddington, is very close to the station and buses so very accessible to local residents. The proximity of the Teddington Police Station to the current premises makes it an ideal site for the relocation of the practice in that it will combine the current accessibility with a purpose built surgery large enough and properly equipped to provide the health care that residents require.
David Hayne	Site Allocation 9: Teddington Police Station, Park Road, Teddington	"I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."
Graeme Fraser-Watson, The Teddington Society (Planning Group)	Teddington Police Station (Site Allocation 9 Teddington Police Station. Section 7 Place-based Strategy for Teddington & Hampton Wick).	We notice on the map that the Teddington Police Station site, as outlined in red, only covers a part of the site. Is there a reason for this ?.
Margaret Judith Davison	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station to ask that - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery
Laura and Nick Forrest	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the place-based strategies</i>)	I think this plan should ensure Park Road GP surgery is relocated to the site as part of any redevelopment to ensure use for the local community. Any planning consent should make the lease of any residential units conditional on the occupation of the GP surgery. The surgery desperately needs a new site suitable for those with disability, access issues, buggies etc and this is opposite the current GP surgery. As a parent and someone with chronic health issues I know that this GP surgery needs much better facilities to be able to expand and meet the needs of the local community. Changes consider necessary: Teddington can not support more housing developments without building its health service to serve new residents. The Park Road GP practice have been waiting for a suitable new site since 2010, when our 2nd baby was born. The existing building is operating to capacity with only a couple of clinic rooms on ground floor level. It's a nightmare carrying screaming babies and sick children upstairs, leaving buggies outside or blocking the waiting area or for those with mobility issues trying to get access and move. The practice accommodates about 10,000 more patients than the building should! The GP practice team are dedicated but need the right building to work in and to expand their services to meet local need. The Teddington police station site would be ideal and should still be at the heart of the community it serves, and can achieve this by being a new GP surgery on the ground level and residential units above. This would make a difference to local families like ours, plus have a knock-on effect on local services like walk-in services, demand in A+E etc and also allow for social care facilities to develop alongside health to improve community wellbeing.
Lesley Redding	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Ann Cornick	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station to ask that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment. - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. As a retired person who has a sight impairment, I walk to the Park Road Surgery. The premises are no longer fit for purpose and a new site needs to be found for the GPs surgery in the nearby vicinity.
Michele Williams	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."

		<p>The Park Lane surgery supports a large number of people locally and desperately needs more space. At a time when we should be looking to support local health services and the wide variety of services they should be providing to the community, I feel it is critical to ensure that space is provided in the ground floor of the police station opposite to allow these services to be provided in a cost effective & efficient manner.</p>
Patrick J Collins	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>"I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none">– the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment– any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery." <p>Securing a new surgery on this site would:</p> <ul style="list-style-type: none">• significantly improve local residents’ access to healthcare• support national policy, in particular the aims set out in the NHS Long-Term Plan to move care out of hospital and into the community• support the Teddington Village Plan• improve disabled access• support the strategic aim for social and community infrastructure and “flexible spaces[...]as part of multi-purpose assets” (“Securing new social and community infrastructure”, draft Local Plan) <p>I would add that the site is a 15 minute walk from my house, and is also accessible via 3 bus routes. This compares favourably with other sites the surgery has considered for relocation.</p>
Mark Yates	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on section 9 Teddington Police Station to ask that Park Road Surgery be relocated there as part of any redevelopment and that any planning consent makes the sale or lease of any residential units is conditional on the occupation of the GP surgery.</p>
Johann Martin	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none">– the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment– any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Stella Mccusker	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9 Teddington Police Station to ask the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment -any planning consent makes the sale or lease of any residential units conditional of the GP surgery.</p>
Ann Sandford	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am a patient of the Park Road Surgery opposite this site. The current surgery premises are too small for the number of users and the growing demands placed on GP surgeries. They are unsuitable for patients with mobility and other special needs.</p> <p>However they are ideally located being central and well served by public transport meeting key parts of the Council's policies and strategies for it's community.</p> <p>The transfer of the surgery to the former police station site would solve the problems of the existing premises whilst maintaining the benefits.</p> <p>Changes considered necessary: Paragraph 7 of the Place-based Strategy, Site allocation no 9 Teddington Police Station Park Road Teddington of the Local Plan should include a requirement that The Park Road Surgery Teddington be relocated to the site as part of any redevelopment of the site. Further any planning consent granted shall be conditional on an appropriate part of the site to be used as a GP surgery with ancillary services and amenities.</p>
Wendy J Norman	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I strongly support the allocation of Site 9 for community/social infrastructure-led mixed use development.</p> <p>It is vitally important that sites for such uses are maintained as increased residential densities occur throughout the Borough and especially within Teddington. Once lost- these sites are very difficult to replace.</p> <p>In particular priority should be given within community/social infrastructure allocations and when planning applications are submitted, for essential health provision eg doctors practices. This is particularly pertinent in this instance where the Park Road Surgery has inadequate facilities, has long been looking for a new site and the police station site is opposite and perfectly suited for relocating a new GP practice use.</p>
Chris Whittome	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the introduction, strategic vision, strategic objectives, Policies 1 and 2, and the place-based strategies</i>)	<p>For some years the Park Road Surgery has been seeking larger more suitable premises for the work they do, and could then do, to service the needs of the local population. This includes part of the Waldergrave Road site in which RHP are now located, and the plan for Udney Park Playing Fields which has been abandoned. This matter is urgent. With the withdrawal of the full function by the Met Police in Park Road it would seem sensible to strongly consider Park Road Surgery' s request for inclusion at that site. Please assess this request in your considerations.</p> <p>We live in [Teddington road name removed for data protection] and have till now founds our local Doctors Surgery to deliver good help when ever needed. As demand has grown on them they have outgrown their property with front door in Park Road and our household would welcome their transfer to a new location on the Teddington Met Police Station site.</p> <p>At 75 years of age, we are more vulnerable than when young. We welcome the idea of our effective local Doctor's Surgery being close at hand but they need a larger site as they develop more responsibilities to assist the NHS to be more efficient.</p> <p>A transfer of site for the Park Road Surgery to the Police site across the road would seem to be an excellent location for this busy effective Surgery.</p> <p>We would welcome a new facility for the Park Road Surgery if with sufficient space on the current Met Police station site when it is redeveloped. We would also welcome Police Presence fairly near at hand.</p>
Leslie Welch	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I would like to comment on Section 7 of the latest Local Plan with particular reference to Site Allocation 9, Teddington Police Station, and am requesting that the Plan should make adequate provision for the existing Park Road Surgery to be relocated on this site as part of any proposed redevelopment, and that any planning consent related to this site should require the sale or lease of any residential or commercial units to be made conditional on the allocation of sufficient space for occupation of by the GP surgery and other support health and social care facilities.</p>
Eileen Folan	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I would like to add my support to the Park Road Surgery request that the relocation of the GP surgery should be made conditional to the sale of the police station. The council is aware that the surgery has to move and this relocation would cause minimal disruption to the thousands of residents who currently use this surgery. It is an excellent group practice which has outgrown the current premises.</p> <p>The current reference in the local plan for Teddington is too vague to guarantee that our local GP service is prioritised.</p> <p>I have tried to respond using the consultation feedback but the form doesn't allow for specific issues unless all other questions are answered. It is too long and seems to have been designed to deter, rather than encourage, resident feedback.</p> <p>Very disappointed that the mayor of London has closed the police station, and would like to see some police office presence in Teddington - in library or maybe a small office in the existing building. Appreciate the reference to health or medical facilities on the ground floor but would like to see more explicit support for the relocation of the Park Road Surgery to the police station.</p> <p>They are in desperate need of new premises and these would be ideal. There would me minimal disruption to the thousands of people in Teddington who use this practice. The council should do everything in its power (and beyond) to ensure the developer works with Park Road Surgery to incorporate this essential resource in their plans. We are lucky to have such a good GP practice here.</p>

David Cloke	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>“I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none">– the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment.– any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Sally Serkovich	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>Unfortunately I am unable to download the Consultation Form or make a comment on the website as it seems to have frozen. I am therefore emailing independently.</p> <p>I wish to comment on Section 7 Site allocation 9, Teddington Police Station. I ask that the Local Plan requires Park Road Surgery (currently at 37 Park Road) to be relocated there as part of any redevelopment, and that any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.</p>
Philip Tucker	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>My representation concerns the relocation of the Park Road Surgery which is in nearby premises that are unsuitable for the needs of the practice's patients. The practice largely occupies what must have been a residential property which has been adapted. However, amongst many drawbacks, it is cramped and lacks suitable disabled access to the building itself and to the upper floor in particular. If the surgery had purpose built premises designed to suit the requirements of a modern community health hub of the type proposed for the failed Udney Park development, it could provide an enhanced range of services and improve the health outcomes of its patients and the wider community. For example, unlike Hampton Wick surgery, Park Road was unable to offer Covid vaccinations on site due to a lack of suitable facilities. Patients had to travel to the Greenwood Centre in Hampton Hill.</p> <p>I believe that there is a very strong case for incorporating a new, modern, purpose designed surgery within the redevelopment of Teddington Police Station to better serve the needs of the local community. To achieve this, I believe that any planning consent should make the sale or lease of any residential units conditional on the occupation of the GP surgery.</p> <p>This area has an abundance of overpriced and unsuitable accommodation, such as the redevelopment of the Thames TV studio site, and therefore I would contend that any residential units to be built alongside the surgery should be social housing.</p> <p>This would demonstrate that the council is able to put health, welfare and affordability ahead of any narrow profit motive.</p>
Vincent Gabbe, Knight Frank, on behalf of the Metropolitan Police Service	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>Proposed Site Allocation 9 (Teddington Police Station) is highly unreasonable and inflexible in its requirements. In addition, inadequate justification is provided. There are two specific concerns.</p> <p>Firstly, the proposed allocation states at the third bullet under the context section that "proposed redevelopment of the site will only be acceptable if social / community infrastructure use is re-provided on the site at ground floor level". This statement is highly inflexible and runs contrary to proposed Policy 49 (Social and Community Use). It also runs contrary to social and community use policies across London. Such policies normally allow flexibility as to social and community infrastructure re-provision, taking into account the demand that exists at the time any planning application is made.</p> <p>Secondly, the seventh bullet states that "on this site, the Council is seeking a social infrastructure use and affordable housing, due to its prominent location and local needs". Again, this statement is highly inflexible and runs contrary to proposed Policy 49 (Social and Community Use). It is also inconsistent with other similar policies across London. What Policy 49 states is that, where 100% affordable housing is proposed, other social and community use re-provision will not be required. The proposed policy should not seek to limit potential uses for this site to just one outcome, particularly where the demand and viability for those proposed uses is unknown.</p> <p>In summary, Site Allocation 9 is inconsistent with proposed Policy 49 and applies an unreasonable and inflexible approach to Teddington Police Station. No adequate explanation is provided for this inconsistency.</p> <p>Proposed Site Allocation 9 should be amended to be consistent with Policy 49.</p> <p>The first sentence of the third bullet of the 'context' section in Site Allocation 9 should be re-worded as follows:</p> <p>"Proposed redevelopment of the site should include social / community infrastructure use at ground floor level, subject to the available demand for such uses. If the ground floor cannot be utilised for social / community use, a detailed case will need to be set out providing reasoning for this, in accordance with Policy 49."</p> <p>The seventh bullet should be amended to state the following:</p> <p>"In accordance with Policy 49 (Social and Community Infrastructure), where a scheme proposes 100% genuinely affordable housing and meets the requirements of Policy 11 (Affordable Housing) in terms of mix, tenure and affordability, the proposals will not be required to provide other social and community infrastructure.</p>
Paul Barker	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	<p>"I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none">– the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment– any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Paul Hargraves	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>It is a golden opportunity to relocate Teddington Park Road Surgery to close by in the Police Station to be removed on Park Road. It will serve the same people in the same area. There is ample space to provide all the facilities the surgery requires. Alternative sites would be too far away, making it difficult for its patients to use.</p>
Larissa Suchecka	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none">– the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment– any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Joanna Sowell	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>It is a golden opportunity to relocate Teddington Park Road Surgery to close by in the Police Station to be removed on Park Road. It will serve the same people in the same area. There is ample space to provide all the facilities the surgery requires. Alternative sites would be too far away, making it difficult for its patients to use.</p>
David Marlow	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>P56 (Site 9). I support Doctor's Surgery at Teddington Police Station site.</p>
Emma Dobson	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station, to ask that the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment.</p>
Andrea Legrand	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station, to request that:</p> <ul style="list-style-type: none">– the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment– any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery <p>The surgery serves a large proportion of the TEDDINGTON population and has been remarkable in its delivery of services throughout the pandemic. I have been a patient (& my family) for over 30years since moving here as a student. It is a part of the fabric of our community and as numbers in the area have grown, so too has the requirement for GP services. A move to this site would ensure more residents could be served and better services could be provided on site thereby helping NHS budgets as well as patients.</p>
John Jenkins	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I wish to give my support to Park Road Surgery and their objective to secure a much needed relocation to the new development of Teddington Police station.</p> <p>The existing surgery has outlived it's usefulness. It is totally inaccessible for many especially those who are disabled.</p> <p>The surgery desperately needs a contemporary surgery which addresses the needs of all of its patients.</p> <p>This site is a perfect location for them and I support their application totally.</p>
Jean Carlin	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I think it's a great plan to take over all or part if Teddington Police Station.for Park Road Surgery.</p> <p>The surgery is in need of more space to do more things. . Having the surgery in a house so old fashioned it's not good having a staircase to walk up and down especially for old people and mothers with children.</p>

		<p>The new premises they will be able to do much more for the patients instead of having to send them to the hospital for minor things.</p> <p>The staff deserve better working facilities</p> <p>I guess above will be turned into flats that will make more revenue.</p> <p>Car parking space for Doctors and ambulances when required. Outside a bus stop it has a lot going for it. Near the chemist.</p> <p>It will be so great for the community. Let's hope it gets approved.</p>
John Miln	I am referring to Section 7 - Site allocation 9	<p>I am commenting on Site Allocation 9, Teddington Police Station, Ro ask that:</p> <ul style="list-style-type: none">- the local plan requires that Park Road Surgery to be relocated there as part of any redevelopment.- any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP Surgery.
Mr & Mrs Shanks	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>We are commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none">* the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment* any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Jim Brockbank	My detailed response relates to section 7 of the local plan, specifically site allocation 9, Teddington Police Station.	<p>This is a significant community asset in Teddington and an opportunity not to be missed to meet the needs of affordable housing, social care, and primary healthcare in the locality. The Park Road Surgery is a long established teaching practice which in 1979 had 2 partners and 5000 patients, it now has 5 partners, salaried GPs, nurses and a management and reception team, and serves a population of 13,000 from the same building. This building is no longer ‘fit for purpose’ and this has been recognised by the CCG and the NHS for more than 10 years but as the local plan has recognised, opportunities to relocate are rare. A new GP surgery on the Teddington Police Station site is no less than the people of Teddington deserve, and the staff at the surgery also, who have coped with inadequate premises over such a long period of time. This ‘fits’ with the NHS long term plan for care in the community, and the local plan strategic aim for social and community infrastructure and the development of multi-purpose assets. Since the pandemic the importance of health, wellbeing and community has been at the forefront of new development and the plan recognises the importance of wellness and fitness as a priority. This is in stark contrast to GP Premises that for more than 10 years have been recognised as not fit for purpose. I strongly support that The Park Road Surgery Teddington be included in any redevelopment of Teddington Police Station</p>
Jane Cliff	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>This surgery is no longer fit for purpose. I request that a new surgery be integrated into any plan for the development of the police station. I am registered with this surgery.</p>
Hilary and Chris Gooch	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>We wish to comment on the place of the Teddington Police station within the local plan. The local plan needs to include the relocation/development of Park Road Surgery on this site. The current accommodation is totally inadequate for current local health care provision. Inclusion in any development on the Police station site will keep the surgery close to its current location an advantage for their patients.</p>
Ken Ward	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am writing to comment on section 7 of the plan, with specific reference to site allocation 9, Teddington Police Station.</p> <p>I would ask that:</p> <ul style="list-style-type: none">·the Local Plan requires that Park Road Surgery be relocated to the site of the police station as part of any redevelopment;·any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
John and June Demont	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>We are writing in support of the application by Park Road Surgery, Teddington to secure premises in the development of Teddington Police Station.</p> <p>The current premises in Park Road have become totally inadequate to meet the needs of this busy surgery. When we joined the two doctor practice 40 years ago the range of services was far more limited and the practice today really struggles to provide accessible consulting rooms to cope with the numbers of patients registered at the surgery and the range of services that they offer. The fact they cope as well as they do is a great tribute to the dedication of both medical and administrative staff.</p> <p>To move just across the road would be the perfect solution to the problem and one which it is in your power to provide. I urge you to look upon this application as one which would be of huge benefit to a large number of Teddington residents and would enable the wonderful team of Doctors and administrative staff to carry out their jobs in a much more satisfactory way, benefitting both them and their patients.</p>
Denise July	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am responding to the Local Richmond upon Thames Consultation Plan, specifically site allocation 9, Teddington Police Station to ask that:</p> <ul style="list-style-type: none">- the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment- any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. <p>I have been a patient of this surgery for 30 years and we desperately need a new site.</p>
Victoria Little	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I would like to add my support for the relocation of Park Road Surgery to the site of Teddington Police Station.</p> <p>This would be an excellent solution for its relocation, just across the road from its current premises.</p> <p>Park Road surgery is a very important part of the immediate community and this would represent an excellent solution.</p>
Lynda Norman	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none">- the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment- any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP Surgery
Michael and Jackie Perry	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I and my wife are writing to register our strong support for the Park Road Surgery being relocated in the Park Road Police Station.</p> <p>We are elderly patients, registered with the surgery, and live in [Teddington road name removed for data protection]. The relocation would mean the least possible interference with their excellent services.</p>
Stella Smith	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am responding to Section 7 of the Plan and specifically to Site Allocation 9 development of Teddington Police station.</p> <p>The Local Plan should require that Park Road Surgery be relocated there as part of any future development.</p> <p>They are currently operating in a building that was for 3000 patients and they are now trying to manage over 10,000 patients there. The new development must accommodate social and community use and especially to include Teddington Park Road Surgery who have long outgrown their building and are struggling to provide a satisfactory medical service to the local community.</p> <p>Any planning consent must make the sale or lease of any residential units conditional on the occupation of the site by the Park Road GP surgery.</p>
John Blackwell	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I would totally support any plans for the existing Park Road Surgery to be incorporated into any proposed development of Teddington Police Station</p>
Nicole Davies	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I fully support a new GP surgery for Park Road as part of the redevelopment of Teddington Police Station. This would be an excellent site, very central and reasonably close to bus stops in Broad Street.</p>
Amanda Root	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am aware that for many years the Park Road Surgery has been seeking larger more suitable premises for the work they do, and could perhaps expand to do for the local community.</p> <p>With the withdrawal of the full function by the Met Police in Park Road it would seem sensible to strongly consider Park Road Surgery's request for inclusion at that site.</p>
Patty Lloyd	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>Park Road Surgery is an NHS GP surgery which looks after just over 13,000 patients across a catchment area which includes the Teddington ward and part or all of the five neighbouring wards of Fulwell & Hampton Hill, Hampton, Hampton Wick, South Twickenham, and West Twickenham. Our existing premises is a converted Victorian house which should let us look after about 3,400</p>

		<p>patients, meaning we are accommodating about 10,000 more patients than the building should; this is the highest number of excess patients for any surgery in the borough, and our urgent need to move premises is recognised in that we are top priority in the Richmond CCG Estates Strategy.</p> <p>We would therefore ask that Site Allocation 9 specifies that this medical need must be met as part of any redevelopment of the Police Station, in line with the existing text which says that “proposed redevelopment of the site will only be acceptable if a community/social infrastructure use is re-provided on site at ground floor level, such as for a medical/health use.”</p> <p>We also call for the site allocation to be more specific about the need for a co-located health and social care facility, combining our need with space for local charities and a shared community space for health and wellbeing.</p> <p>This matters because the Teddington Police Station is a large community asset in the centre of Teddington, and because ongoing residential development without corresponding healthcare development increases the pressures GP surgeries are under, and worsen the service available to patients. Park Road Surgery’s existing building is operating at capacity all the time, with nowhere physically to put more staff to answer the phones or to see patients, nor to cope with spikes in demand like winter pressures. Physical access is terrible, particularly for those with buggies, or mobility difficulties, and half the consulting rooms are on the first floor.</p>
Trish Harle	Site Allocation 9: Teddington Police Station, Park Road, Teddington	Park road surgery is in need of new premises. The existing surgery is now inadequate for patients with buggies and the disabled. The Teddington police station is a perfect choice for good transport links for those patients able to use them.
Vin Chauhan	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>As the Park Road Surgery has been looking for larger premises for a number of years this Police Station site in Teddington would be the ideal site.</p> <p>The Park Road Surgery is just about coping with the large number of patients and I feel the Teddington Police site is a right place for it.</p> <p>It would seem sensible to consider Park Road Surgery's request for inclusion at that site.</p>
Felicity Jackson	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>As you are aware, Park Road Surgery has been overwhelmed by the ever increasing number of patients on its books, so has been seeking more suitable premises. It would seem sensible to allocate the former Teddington Police Station property to them to develop into a facility that is appropriate for the community and which anticipates future requirements (and in conjunction with other community needs). However, what is planned is very unclear on the Richmond Planning website. The plans need to be clarified and there should be a public consultation. Communication is very poor on this proposal.</p> <p>On the face of it, the site would be ideal for Park Road Surgery.</p>
Eve Whitby	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>Help Park Road Surgery relocate to site of Police Station. I would like to state that Park Road surgery would benefit by relocating to Police station site as it is very near for the patients to access easily with a few parking spaces.</p> <p>There would be more room for the doctors to work and would free up the doctors site for extra housing in the area.</p>
Jennie Gower-Smith	Site Allocation 9: Teddington Police Station, Park Road, Teddington.	<p>Please take this email as local resident support for the inclusion of a gp surgery in the redevelopment of the Teddington Police station site.</p> <p>I live on [Teddington road name removed for data protection] and the doctors surgery is vital to local residents and a close relocation would be a huge advantage.</p> <p>The site should not be used for purely commercial private development but rather an appropriate use of facilities in the heart of Teddington.</p>
Tove Smith	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I fully support the application from Park Road Surgery in Teddington to relocate to Teddington Police Station premises in Park Road. I am a Teddington resident and registered with Park Road Surgery.
Chrissie Wrench	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>Residents need Park Road Surgery to get planning permission to relocate to the Teddington Police Station.</p> <p>The whole community would benefit from this move to larger premises.</p> <p>Offering extensive servicesz</p>
Bartle Smith Smudge	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I believe that there should be a gp surgery in the Teddington police station site it would improve access for elderly and physically impaired patients and help the surgery to accommodate a growing local population
Lauren Bloch	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station to ask that:</p> <ul style="list-style-type: none">- the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment- any planning consent makes the sale of lease of any residential units conditional on the occupation of the GP surgery.
Caryn Jenner	Section 7, Site Allocation 9, Teddington Police Station	<p>Re Teddington Police Station, Park Road, Teddington</p> <p>I believe that it is crucial for ground floor space in the redeveloped police station to be allocated to a GP surgery. Specifically, the Park Road Surgery has been in need of more space for some time to look after its 13,000 local patients and the redeveloped police station across the street from the surgery would provide the ideal location.</p>
Gemma Johnson	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I would like to add my support to a new Park Road surgery as part of the redevelopment of Teddington police station.
Rob Mitchener	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>Teddington Police Station re development. I support the use of this facility for in part new premises for Park Road Doctors Surgery. A new and much needed bespoke facility could be created in the redevelopment of the Police Station. A new facility at Udney Park Road didn’t happen the location is perfect for a community facility just across the road from the current surgery.</p> <p>Please incorporate this change.</p>
Jane Sweetman	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am writing in connection with the Local Plan consultation, specifically on site allocation 9 for Teddington Police Station. I am asking that the Local Plan requires the site be allocated for social infrastructure use and that Park Road Surgery be relocated to the site as part of any redevelopment and that any planning consent makes the sale or lease of any residential units on this site conditional on the occupation of the GP surgery.
Liz Waters	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	There is an urgent need in Teddington to ensure the local community is adequately provisioned with GP services. The Park Rd Surgery needs to be supported in moving to larger, more suitable premises such as on the Police Station site. Any planning consent for this site should make the sale or lease of any new residential units on the site conditional on a replacement GP surgery being provided.
Michael Whitham	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none">– the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment– any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Wendy Whitham	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none">– the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment– any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Michael Cole	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am writing to express my support for the bid by The Park Road Surgery to move into the Teddington police station, once developed.</p> <p>Due to the fact that the current building is now far too small for the surgery, it being oversubscribed by approximately 10000 patients, there is urgent need for much more space. Indeed, since we can expect the local population to increase, the situation can only worsen.</p> <p>The current access to the various examining rooms is extremely difficult for all but the fit and youthful.</p> <p>By contrast, the police station building seems much more suitable. It has an easy access and a large ground floor footprint with disabled parking readily available.</p>

		Also, since some patients are from Fulwell, Hampton, Twickenham and Hampton Wick the proximity to Teddington Railway Station and various bus routes, a few hundred yards away will maintain a desirable connection. The location is, without a doubt, highly suitable, since it already is the site of a public service organization, so will have little negative impact on local residents.
Elizabeth, Seymour and Joshua Kelly	Site Allocation 9: Teddington Police Station, Park Road, Teddington	We support the Park Road GP Surgery moving into premises on the old police station site opposite. Should be grateful if you would register our support for this.
Peter Vincent	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am a resident of [Teddington address details removed for data protection] and a patient of Park Road Surgery and would like to voice my option that in the site allocation I would like Park road surgery be included in any redevelopment . I am commenting on site allocation 9 Teddington police station . In that that the local plan requires park road surgery to be relocated ,there as part of any redevelopment. And any planning consent to make the sale or lease of any residential units conditional on the occupation of the surgery.
Barbara Egan	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am very keen for Park Road Surgery to be relocated to the Teddington Police Station site (site allocation 9). I am 86 and have difficulty accessing the upstairs rooms of the current Surgery. The current building is too small and new premises are urgently needed. I ask in the strongest terms that Park Road Surgery should be relocated to the Police Station site as part of any redevelopment. In addition, any planning consent given must make the sale or lease of any residential units conditional on the occupation by the GP surgery.
Joyce Smith	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I ask that the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment, and that any planning consent makes the sale or lease of any residential units conditional on occupation by the Park Road GP Surgery.
Theodore Serkovich	Site Allocation 9 Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: the Local Plan requires Park Road Surgery, currently based at 37 Park Road Teddington, to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Kathleen Barnes	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I would like to comment on this. Whilst I would support a move by the local GP surgery at Park Road (where I am a patient) to a new modern site across the road this must be adequate for all its NHS requirements and current and future needs and fit in with extant local planning guidance for the site which I understand is for Community Use with any residential use being additional to that and also in line with policy (notably affordable housing).
Sue Ford	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station to ask that: - The Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - Any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery
Sadie Green	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I have only just heard about the proposal to move Park Road Surgery to the old Police Station site. This is the first I have heard that this whole consultation is even happening. I would like to support the move but I have not been able to read about the proposal in detail to see what the wheelchair access will be like. I am a frequent user of Park Rd and I attend in my wheelchair.
Zoe Ide	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	Welcome the inclusion of Health Centre wording however think this should be a mandatory requirement for any developers and would suggest that Park Road Surgery who has been looking for a new home for 10 years and be specifically supported to relocate. They are currently catering for 10.000 patients more than their current building should.
Kerry Chauhan	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I support this application. The local population has increased and the present surgery is too small to provide the necessary facilities. The site of the Park Road police station is ideal.
Andrew Norman	Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I support the proposal to re-provide a community/social infrastructure use at Ground floor within any proposed redevelopment of this site. This should be as a replacement for the Park Road Doctors practice where there is already a proven need to find alternative modern accommodation. This site would enable the practice to continue to operate in the same part of Teddington serving the nearby local residents. I also support the proposal for 100% genuinely affordable housing to be provided. As a site in the centre of Teddington this would allow very good access to transport facilities for the residents.
Mr & Mrs S Drudge	Site Allocation 9: Teddington Police Station, Park Road, Teddington	The opportunity should be taken to enhance the local medical facilities of the Town by incorporating the existing Park Road medical practice into the proposals for the Police Station Development, thus allowing potential expansion opportunities to suit the future needs of the local community.
Matt Allchurch	Site Allocation 9: Teddington Police Station, Park Road, Teddington	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Mark Newman	Site Allocation 9: Teddington Police Station, Park Road, Teddington	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”
Catherine Thomas and Valentin Andreev	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I wish to support The Park Road GP Surgery in Teddington with their wish to relocate to the former Teddington Police Station redevelopment. I would also like to reiterate their wishes that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment. -any planning consent makes the sale or lease of any residential units conditional on occupation of the GP Surgery.
Andy Hale	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on [Teddington Police Station Site]. Teddington continues to benefit from infilling to provide additional housing. However, to support the population growth it needs proper infrastructure, such as medical facilities. The site, if no longer required for police facilities, should be kept for community purposes only. No residential development should be allowed.
Kevin Curtin	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I have been a resident of Teddington in the wonderful borough of Richmond for over 25 years and been a patient at the excellent Park Road Surgery throughout that time requiring their help for me and my family on numerous occasions. I am contacting you re. Site Allocation 9 – Teddington Police Station which would be the ideal site for the Surgery to accommodate all the thousands of their patients, to extend the facilities and services which they offer, to improve access for disabled patients and to enhance the quality of life for the whole community.
Carolyn Doughty	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I feel very strongly that adequate space should be allocated for the relocation of Park Road Surgery on the ground floor of any future building. They are an excellent practice serving thousands of local people. Their current building is no longer fit for purpose and the proposed move to Udney Park was rejected.
Sharon Newman	Site Allocation 9	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.
Judith Rutherford	Site Allocation 9: Teddington Police Station, Park Road, Teddington	As a patient of Park Road Surgery and a local resident, I wish to offer support for any plans for the redevelopment of Teddington Police Station to include appropriate accommodation for Park Road Surgery.
Judith Heyworth	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I have lived in Teddington in the wonderful borough of Richmond for over 45 years. Throughout those years I have regularly used the excellent Park Road Surgery for all members of my family, children and now grandchildren. I would like to support the use of Teddington Police Station to enable the expansion of the Park Road Surgery to cope better with all its thousands of patients. They will be able to extend their services and facilities, including improved access for the disabled.


Emma Durnford	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am writing to register my views on the LBRUT proposal for the future of Teddington and in particular the redevelopment of the old Teddington Police Station site on Park Road, Teddington. Unfortunately the downloadable form and the online portal is ambiguous and overly complicated. With this in mind, in the interests of fairness, I would like you to include my comments below.</p> <p>I am commenting on SECTION 7 - SITE ALLOCATION 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none">- the Local Plan REQUIRES Park Road Surgery to be relocated there as part of any redevelopment;- any planning consent makes the sale or lease of any residential units CONDITIONAL ON THE OCCUPATION OF THE THE GP SURGERY <p>I have been a patient at Park Road Surgery since I moved to the Borough in 2003. We are fortunate to have this surgery and the excellent Doctors, nurses and team. However, the current location in a converted residential house has clearly identifiable limitations on accessibility for those with differing physical needs or parents/guardians bringing young children for appointments. Space is limited in the waiting area and direct access between the consultation rooms on the upper floor and reception area could be potentially difficult for both patients and staff.</p> <p>Taking the considerations above into account, the inclusion of a specifically designed space for the Park Road Practice in any new development on the site of the old Police Station is essential to the local community.</p>
F A Rowbotham	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>As encouraged by the Park Road Surgery, 37 Park Road, Teddington, Middlesex, TW11 ... as a Patient and as a nearby Resident (<i>rather elderly</i>) I have tried <i>very hard</i> to make the relevant comments about the Teddington Police Station, which needs to be sent in by Today. I completed your relevant Form, Section 7. Site Allocation 9., but was unable to master how to Email it to yourselves. Therefore I am trying to do it this way. Could you please register on the suggested relevant Planning Forms that I wish to support The Park Road Surgery, Teddington, in their website comments?</p>
Barbara Fryatt	Site Allocation 9: Teddington Police Station, Park Road, Teddington	We support a move to police station site
John Sheppard	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I write with regard to the suggested plan to move and create a new surgery at the old and currently mostly vacant Teddington Police Station. I think that the plan is ideal – the site is perfect and I am wholly supportive – the access it will continue to provide to nearby public service facilities i.e. both bus and rail adds to its attraction – it is also much larger than our current surgery in a converted residential house and will therefore provide for greater opportunity to both extend and improve health and safety services in Teddington.
Kenneth Howe	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9. Teddington Police Station to ask that:</p> <p>The Local plan requires Park Road Surgery be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.</p>
MA & JA Byrne	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>As local residents and local business owners , as well as patients of the excellent Park Road Surgery, we would like to state the following: We are commenting on site allocation 9: Teddington Police Station, to ask that the local plan REQUIRE Park Road Surgery to be relocated there as part of any development and specifically, that any sale or lease of any residential units are conditional of the occupation of a GP Surgery.</p> <p>Please can you kindly acknowledge receipt of this email as it is so important that the surgery is able to expand into that site to fulfil the needs of existing and future patients.</p> <p>The current site is too small and for current requirements and the above would be a considerable benefit to patients and the Borough and very much meters the criteria required as part of the consultation.</p>
Karen L Kirkham	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	Section 7 Site Allocation 9 Teddington Police Station please ensure that the local plan requires Park Road Surgery to be relocated to the site and that this is a condition of the sale or lease of any residential untils
K Peachey	Para 7.1, Site allocation 9: Teddington Police Station	<p>I fully support retention of the OOLTI of this site. Its loss would be detrimental to local residents, giving a more concrete jungle flavour to this part of Teddington. Being able to see OOLTI's is a positive input into the mental health of residents.</p> <p>I think that relocation of Park Road Doctor’s Surgery to the Teddington Police Station site should be integral to any approved development of that site. Teddington Police Station was a community asset and the site should continue to support the local community, if not with police premises then with our local Doctors’ surgery because they need to relocate to an area accessible to their existing patients.</p>
Alan Smith	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the place-based strategies</i>)	<p>I comment specifically on Section 7 / Site Allocation 09 - Teddington Police Station.</p> <p>I agree its location & position supports a new use NOT directly linked to retail / commercial / trading.</p> <p>The noted preference for community / social infrastructure is logical. When linked to existing transport and infrastructure services this would form a natural new use that should be consistent with other related proposed strategies & policies such as 20 min neighbourhood concepts etc.</p> <p>The draft suggests possible shared use in any future redevelopment. The combination of residential / affordable housing above ground floor with medical / health use only at ground floor should be reviewed.</p> <p>Significant community / social infrastructure benefits could be available and viable if this site were to be preferred for sole medical / health use to address the longstanding shortage and underprovision of modern primarycare integrated facilities. Any final version of this "draft local plan" should review and reconsider the proposed shared uses to enable and allow this particular site (09) to be zoned to require</p> <ul style="list-style-type: none">– the Park Road Surgery to be relocated there as part of any redevelopment– any planning consent that even considers or makes the sale or lease of any residential units conditional on the occupation of a modern multi-facility GP surgery adequate to provide full primary and related heathcare services to the size and requirements of the totality of its GP practice patients.
Alan Smith	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I fully support the plans to relocate Park Road Surgery to the old Teddington Police station building. I am a Teddington resident and live in [Teddington address details removed for data protection] .
Jeremy Smithers	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I and my wife have lived at this address for 43 years. We have always used Park Road Surgery. As it has got too small we always thought that the police station opposite would be the perfect location. When that stopped being a police station we hoped that it would not just be turned into flats like so many places round here. We are not against putting some flats in there particularly affordable ones but we would urge you to make it a condition that the Park Road Surgery should be on the ground floor.
Olivier Somenzi	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>i am commenting on site allocation 9 (Teddington Police Station) to ask that:</p> <ul style="list-style-type: none">- the local Plan requires Park Road surgery to be relocated there as part of any development- any planning consent makes the sale or lease of any residential units conditional on the occupation of the Park Road GP surgery
Marcia Cotton	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>Totally support this as a positive move to supporting the local community better.</p> <p>Current GP Surgery at Park Road far too limited in terms of space and the new proposed site will provide an opportunity to offer a far greater number of local community social services.</p>
Eva Eldridge	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>The Surgery definitely needs bigger premises and the best place for the surgery is across the road on the site of the old police station . The site is big enough to house a decent size surgery and room for parking.</p> <p>Park Road Surgery definitely needs to expand and most obvious solutions is to move across the road to the old Teddington Police Station. This site is big enough to house a Surgery with parking . We need to have a doctors Surgery this side of Teddington. You can’t keep building houses and flats and not provide the appropriate amenities to go with them.</p>

Jane Tarbuck	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on Site Allocation 9, Teddington Police Station, to ask that the Local Plan requires Park Road Surgery (the GP doctor's surgery currently immediately opposite Teddington Police Station in Park Road), to be relocated there as part of any redevelopment. And therefore any planning consent to make the sale or lease of any residential units conditional on the occupation of the GP Surgery. I am the daughter of a 97 year old resident of <i>[Teddington address details removed for data protection]</i> (Mr David Taylor), who is a patient of Park Road Surgery. I have been to the surgery and can see they need new premises. They are a very important part of the community hub in that particular location where they have been located for many years, but their premises in an old Victorian property are very old-fashioned. Relocation to a very nearby site would be preferable to minimise disruption for existing patients where the High Street, bus stops and the railway station are all nearby so that patients can continue to get there with ease.
N Maureen John	Site Allocation 9: Teddington Police Station, Park Road, Teddington	The sale and use of the existing Teddington Police Station on Park Road: Park Road Surgery has been in discussions with the CCG and NHS England over new premises since 2010, having looked at numerous sites over that time. Securing a new surgery on this site would: <ul style="list-style-type: none">• significantly improve local residents’ access to healthcare• support national policy, in particular the aims set out in the NHS Long-Term Plan to move care out of hospital and into the community• support the Teddington Village Plan• improve disabled access• support the strategic aim for social and community infrastructure and “flexible spaces[...]as part of multi-purpose assets” (“Securing new social and community infrastructure”, draft Local Plan) I support the proposals in the draft Site Allocations, but would ask that they are strengthened as above to ensure the site continues to be an asset for Teddington in years to come. **I agree with the above which is copied from the Park Road Surgery website and altered to reflect my support.
Christine Palmer	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9. Teddington police station, to ask that the local plan requires Park Road surgery to be relocated there as part of any relocation- any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. as a resident of Teddington for 55 years and a grateful user of this practice for 40 years my family, living here too, agree this would be hugely advantageous to the continued health and well being of this community
	Place-based Strategy for Twickenham, Strawberry Hill & St Margarets	
David Cornwell, Strawberry Hill Residents Association	Section 8 Place Based Strategy for Twickenham, Strawberry Hill and St Margarets	1. Overall Strategy - 2nd paragraph A short strategy is set out for six of the seven separate areas defined within the overall Twickenham, Strawberry Hill and St Margarets Area, however the seventh area, Strawberry Hill (C4), is omitted. This should be rectified and we suggest the following wording would be appropriate: 'For Strawberry Hill Residential, which has a distinct identity, the strategy is to conserve the existing character and enhance the centre around the station.' 2. Policy We do not understand Wellesley Road being quoted as an example for 'reanimating local commercial areas'. Wellesley Road is a residential road and whilst there are three shops and a restaurant in Wellesley Parade at the end of Wellesley Road, all are let and operating.
Jon Rowles	8. Twickenham, Strawberry Hill, & St Margarets	This is far too big to be a 20-minute neighbourhood. Google Maps estimate that walking from David Lloyd Heath Club at one end to Richmond Bridge at the other would take you 1 hour, 8 minutes. Either the area needs dividing up, or a subset of neighbourhoods set up and strategies for each one developed. The strategy is again a list of aims that are somewhat generic, and most of them could be applied to anywhere. They are clearly not as thorough as the Twickenham Area Action Plan and indicates that the council hasn’t put in as much effort to engage with residents. The riverside in Twickenham is semi-rural in character in most parts, and there is a need to protect the viability of the boatyards on Eel Pie Island. When the Twickenham Area Action Plan was examined the inspector highlighted the importance of the car-parking on the embankment for their viability. This new plan is seeking to remove this protection and this needs very careful examination. I doubt short term loading bays would be enough to keep the boatyards in business and there is a need to establish the parking needs.
Alexandra Bamford, Boyer Planning on behalf of Twickenham Film Studios	Page numbers: 63, 64, 65, 66, 210, 211, 212 Paragraph numbers: 19.39, 19.40, 19.41, 19.42, 19.43, 19.44, 19.45, 19.46 Policy no./name: 24. Industrial Land Place-based strategy: 8. Place-based Strategy for Twickenham, Strawberry Hill & St Margarets	1. INTRODUCTION These representations have been prepared by Boyer on behalf of Twickenham Film Studios Ltd in relation to the Draft Richmond Local Plan, which has been published for consultation under Regulation 18. In responding to the consultation, the representations make specific reference to Twickenham Film Studios, The Barons, Twickenham, TW1 2AW (‘the Studios’) owned by our client, and to Arlington Works, Arlington Road, Twickenham, TW1 2BB, which is directly adjacent to the Studios. These representations set out our client’s response to a number of items in the draft Local Plan and provide commentary on the relevant policies. In particular, our client’s representation focuses on draft Policy 2 ‘Spatial Strategy: Managing change in the borough (Strategic Policy) (Place-based Strategy for Twickenham, Strawberry hill & St Margarets)’ and Policy 24 ‘Industrial Land’. These representations aim to highlight the importance of the Studios and Arlington Works for continued industrial use in the context of the recent proposals (Ref: 18/2714/FUL) to redevelop Arlington Works for mixed-use, which was refused at appeal (Ref: APP/L5810/W/20/3249153). As part of our representations, we propose the designation of ‘Arlington Works’ as a ‘Locally Significant Industrial Site’ (LSIS) in the draft Policy Map. Structure of Statement This Statement is structured as follows: <ul style="list-style-type: none">• Section 2 sets out our interest in the draft Local Plan;• Section 3 sets out our response to the Draft Local Plan and provides commentary on specific policies;• Section 4 provides a summary and conclusion. 2. OUR INTEREST This Section sets out our client’s interest and reason behind submitting written representations to the Draft Richmond Local Plan Regulation 18 consultation. Twickenham Film Studios On behalf of the client, Boyer has recently secured planning permission (Ref: 21/0094/FUL) on 14th January 2022 for the refurbishment and development at Twickenham Film Studios. The description of development is as follows: “Erection of a new four-storey block (Block A), comprising of a ground-floor café (Use class E(b)), with the upper floor in office use (Class E(g)(i) at the front corner of St Margarets Road and The Barons, together with the partial demolition of Block C and the construction of a single storey extension, the construction of an additional storey and external stair access to Block E, the construction of an additional storey above Block H and the refurbishment and modernisation of all existing blocks within the site along with new signage.” The Council were entirely supportive of the application to expand and refurbish the Studios and noted the value that the Studios added to wider creative industries, specifically in terms of the GVA added to the local and national economy. The current development plan recognises the importance of creative industries, and of Twickenham Film Studios itself. The Local Plan identifies the Studios as a Locally Important Industrial Land and as of particular importance for locally creative industries. Arlington Works Boyer were instructed by their client to act as a Rule 6 party in an appeal against the redevelopment of Arlington Works, Arlington Road, Twickenham, TW1 2BB.

		<p>An application (Ref: 18/2714/FUL) for mixed-use redevelopment was refused on 19th September 2019. The description of development is as follows: “Redevelopment of the site to provide 610sqm of commercial space (B Class) within existing Buildings of Townscape Merit plus a new build unit, 24 residential units (5 x 1 bedroom, 12 x 2 bedroom and 7 x 3 bedroom) and associated car parking and landscaping”.</p> <p>The applicant decided to appeal the decision (Ref: APP/L5810/W/20/3249153), which was dismissed by the Inspector following a 10 day Inquiry.</p> <p>As a Rule 6 Party we were able to comment on the possible implications for the continuing operation of the Studios, in relation to the support for the development plan in relation to industrial policy; implications of noise and disturbance; and loss of parking.</p> <p>It is important to note that the Inspector placed significant weight on how planning policies and decisions should recognise and address the specific locational requirements of different sectors, including the creative industries.</p> <p>The QC acting on behalf of the client was able to convey to the Inspector through the appeal process that the Studios’ were looking to expand its operations and how the appeal site represents the Studios’ only opportunity to do so at its existing premises. In the decision notice the Inspector made clear, in relation to the second main issue ‘possible implications for industrial and employment land policy’, that “<i>the appropriate use of the appeal site, at least in the first instance by virtue of the sequential test and other associated policies, is for industrial purposes and waste management. Aside from the safeguarded waste use, the industrial presumption could include, together with all other policy-compliant possibilities, opportunities for TS to pursue expansion. Even in the absence of any other marketing as expected by the development plan prior to consideration of non-industrial use, the very real and already expressed interest of TS in seeking to acquire and develop the site to date demonstrates the validity of the plan’s expectation to retain the land for industrial purposes</i>”.</p> <p>The Inspector concluded that “<i>proper application of development plan policies includes an opportunity for possible TS expansion onto the site of Arlington Works unless and until such time as the sequential steps are discharged or such other alternative industrial development materialises. Should that industrial ambition of the development plan be abandoned prematurely and without justification, an important potential opportunity would also be lost for Richmond, for London, and for the national film industry</i>”.</p> <p>3. RESPONSE TO DRAFT LOCAL PLAN</p> <p>We set out our response to the relevant draft Local Plan policies below.</p> <p>Policy 2 – Spatial Strategy: Managing change in the borough (Strategic Policy) 8. Place-based Strategy for Twickenham, Strawberry Hill & St Margarets</p> <p>The overarching aim of the policy is to ensure that growth is delivered in a sustainable way, with supporting infrastructure, while tackling the climate emergency and biodiversity crisis.</p> <p>Part B) of the policy states that development in the Borough will prioritise the use of previously development land, including the reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment.</p> <p>Part D) of the policy states that proposals should have regard to the relevant place-based strategy and set out how a character and design-led approach to change has been taken.</p> <p>We are supportive of the policy in its entirety and consider that it should be given significant weight by the Council in their Local Plan Review.</p> <p>The place-based strategy that we seek to comment on is in relation to ‘8. Place-based Strategy for Twickenham, Strawberry Hill & St Margarets’. The area encompasses Twickenham Town Centre and Green, Twickenham Residential, and Twickenham Riverside, along with the residential areas of St Margarets and East Twickenham, and Strawberry Hill and Fulwell and West Twickenham Residential within. The Studios’ is located within this boundary and therefore our client has a specific interest in this area-based policy as it could affect future development on their Site.</p> <p>The policy highlights that the area is an important employment location and states that “<i>Twickenham Film Studios provides studios, post production and production solutions</i>”. The client supports the recognition of the Studios as an important employment location in this area based policy.</p> <p>We are supportive of the criteria set out within the policy against which future development will be assessed against.</p> <p>[See comment in relation to Policy 24 and conclusion]</p>
Gary Backler, Friends of the River Crane Environment (FORCE)	8 Place-based Strategy for Twickenham, Strawberry Hill & St Margarets	<p>We welcome the policy which seeks that future development “Contribute to protecting, enhancing and making the most of the character of the built and open environment, including the River Thames and Crane riversides and associated river related activities,” giving equal importance to the Crane and the Thames. We believe that the River Crane, released from its concrete channel between Mereway and the A316, naturalised and with continuous public access, has the potential to become a significant ecological and leisure amenity for the Borough. We also support the policy to “Maintain and provide new public toilets within the public realm,” and would particularly welcome this in the area of the Shot Tower, to serve the western extremity of Crane Park and Little Park.</p> <p>In the context of residential development currently underway at Site Allocation 11, and considered at Site Allocations 12, 13 and 14, and the risks of overloading the fixed supply of public open space at Craneford West Field and Kneller Gardens, we note the omission from this Consultation draft of any reference to the Council Depot site. This site may be too large for future Depot purposes. The site has a direct frontage onto the DNR and lies adjacent to the pathway along the River Crane. Greening and opening parts of the site to public access may address some of the pressures generated by residential developments at Sites 11-14.</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Place-based Strategy for Twickenham, Strawberry Hill & St Margarets	<p>We note that there are a number of sites within Twickenham town centre which have potential for residential use and collectively will have a cumulative impact of healthcare infrastructure.</p> <p>Policy 10 New Housing indicates that the area has the capacity of 1,100-1,200 new homes over the next ten years.</p>
Philip Villars, WSP on behalf of Sharpe Refinery Service Limited	8 Place-based Strategy for Twickenham, Strawberry Hill & St Margarets	<p>In relation to Policy 8, we consider the following to be necessary:</p> <ul style="list-style-type: none">- The policy should be given a clear number and title;- The policy should be clear as to whether it refers to St Margarets Local Centre or St Margarets Residential and give a clearly defined boundary for this;- The policy should consider sites within the area that have the potential to deliver housing and commercial mixed use development within the area to support St Margarets and the London Borough of Richmond achieve the vision and objectives set out at the start of the new Local Plan.- Arlington Works should be included within the site allocations for Policy 8 given the potential that the site has to deliver with certainty much needed homes and commercial floorspace through a mixed use development.
	Site Allocation 10: St Mary's University, Strawberry Hill	
David Cornwell, Strawberry Hill Residents Association	Site Allocation 10 St Mary's University	<p>3. We note that whilst the site allocation uses the same wording as in the current Local Plan, the University's vision for development on the campus has changed significantly. The University has confirmed to us that its former plans have been abandoned and will not be resuscitated, and that its vision now is to develop and upgrade its existing residential footprint to improve quality and capacity, to make better use of their academic buildings and generally improve the setting of the University.</p> <p>We have no other comments on the remainder of the draft Local Plan.</p>
David Marlow	Site Allocation 10: St Mary's University, Strawberry Hill	<p>P86 (Site 10). St Mary’s University - very limited expansion only acceptable.</p>
Gavin Hindley, St Mary’s University	Site Allocation 10: St Mary's University, Strawberry Hill	<p>We welcome the inclusion of our main campus and the Council’s support for our future growth and enhancement. We propose the following changes to the draft:</p> <p>1. It appears that the red line boundary is not quite correct. An area at the rear of 11 Waldegrave Park which is owned by the University but currently leased to Newland House school has been excluded from the boundary. We request that the plan is adjusted to include this area – please see attached plan showing our ownership.</p>

		<p>2. We note that this allocation includes our sports ground at Teddington Lock. We believe this should have its own separate site allocation. I attach a plan showing the extent of our ownership. We are currently considering options for improving this site. At present it does not provide an acceptable level of student and community experience. Problems include:</p> <ul style="list-style-type: none">• buildings that are no longer fit for purpose with inadequate facilities for changing, showering, social interaction and teaching;• insufficient indoor facilities to support our Sport and Exercise Sciences programmes such as strength and conditioning;• low levels of utilisation as a result of the problems mentioned above. <p>We believe these issues can only be addressed through enhancement of existing building and/or development of new additional buildings and provision of artificial sports surfaces to serve the University and to maintain and enhance our partnerships with the local community.</p> <p>We welcome the opportunity of taking forward a site development brief for each of these sites and would be pleased to meet with Council Officers separate from this response.</p>
Katie Parsons, Historic England	Site allocation 10: St Mary’s University, Strawberry Hill	<p>The Strawberry Hill site, which includes the Grade I listed Strawberry Hill House, Grade I listed Chapel in the Wood, Grade II* registered landscape and Grade II listed College Chapel, is a highly sensitive one. In the past very ambitious masterplans have been put forward for this site which raised some concern regarding the potential threat to the site’s heritage significance, notably the setting of the registered landscape.</p> <p>The estate of buildings within the site vary greatly in quality, from exceptionally important listed buildings dating from the mid eighteenth century, to some functional but architecturally uninspired teaching and residential blocks from the mid-late twentieth century. Ideally the future master planning of the site would explore how lesser quality buildings on site and spaces can be redeveloped, bearing in mind the benefits of reusing buildings to maximise the embodied carbon the process. It is advised that this is considered as an option before considering new development in areas that are more sensitive. We recommend that the site allocation policy is amended to reflect this approach. Equally redevelopment of the site provides opportunities to research the historic landscape, and through reinstatement or reinterpretation, better reveal its significance and that of the listed structures within it. Again, we advise that the policy is amended to specifically highlight the need to make use of any opportunities for enhancement that arise. The policy specifies that new development must take heritage into account, but the policy should go further to place an emphasis on enhancement where possible. There are parts of the site that particularly benefit from its existing open quality, this is one of the findings of the Urban Design Study. Again, we advise that this attribute, and the need to consider this early on the design process, is specified in the policy.</p> <p>We are keen to input into the development of any future Masterplan and/or site development brief (SPD) for the site.</p> <p>An archaeological Desk Based Assessment will be required for this site as it is located within the Tier 2 Strawberry Hill Archaeological Priority Area and has the potential for further finds to enhance our understanding of the development of Gothic Revival architecture, and English landscape design. GLAAS should be consulted at an early stage to advise on place making and public benefit.</p>
Christine Duke	Site Allocation 10: St Mary's University, Strawberry Hill	Agree with strategy.
Katy Wiseman, National Trust	Site Allocation 10: St Mary’s University, Strawberry Hill	<p>Ham House is located approximately 1 mile to the east of proposed Site Allocation 10: St Mary’s University on the opposite side of the River Thames. The proposed site allocation identifies the need to upgrade St. Mary’s University through refurbishment, adaptation, intensification, extension, and new build elements on site. We feel that the St Mary’s University site could be developed without impacting adversely on Ham House provided that the height of new development is restricted to a maximum height to that of existing buildings on this site. Most buildings within the Strawberry Hill Residential area are between 2-3 storeys and policy wording should be added to explicitly state that development will be limited to between 2-3 stories in height. This will also have the benefit of conserving this highly sensitive area as identified within the Urban Design Study 2021, and we are pleased that policy wording for this proposed allocation requires development to have regard to this important study.</p> <p>Changes considered necessary: Most buildings within the Strawberry Hill Residential area are between 2-3 storeys and policy wording should be added to explicitly state that development will be limited to between 2-3 stories in height. This will also have the benefit of conserving this highly sensitive area as identified within the Urban Design Study 2021</p>
Alice Roberts, CPRE London	Site Allocation 10: St Mary's University, Strawberry Hill	<p>Protecting MOL at St Mary’s University</p> <p>While the plan seeks to protect Metropolitan Open Land (MOL) the proposals for St Mary’s University are very likely to involve inappropriate development on MOL and this means the plan would be unsound with both policies contradicting one another.</p>
Jon Rowles	Site Allocation 10: St Mary's University, Strawberry Hill	- this could lead to the further loss of Metropolitan Open Land. A master plan should be developed for the site as part of the local plan and be subject to full scrutiny from the inspector. I would like to see some of the existing building footprints returned to the MOL - to compensate for previous losses.
Philip Briggs, Richmond Bat Species Action Plan Steering Group	Site Allocation 10: St Mary's University, Strawberry Hill	[See comment in relation to biodiversity]
	Site Allocation 11: Richmond upon Thames College, Twickenham	
Christine Duke	Site Allocation 11: Richmond upon Thames College, Twickenham	<p>Both agree and disagree.</p> <p>Old Richmond College Building could be beautifully repurposed rather than demolished. Could be a school/college for drama, dance, film making, gardening and landscape skills, could have a similar attachment to Eden Project, Cornwall etc.</p>
Mark Buxton, RPS on behalf of Richmond upon Thames College	Site Allocation 11: Richmond upon Thames College, Twickenham	<p>Site Allocation 11 relates to Richmond upon Thames College and states the site proposal comprises: “Redevelopment to provide a new replacement college, science / technology / engineering / maths centre, technical hub (B1), a new secondary school and special education needs school, sports centre as well as residential including affordable housing. Protection and upgrading of the playing field to the south of the college, including the installation of a new artificial grass (3G) playing pitch.”</p> <p>As drafted, the site proposal set out within Site Allocation 11 does not reflect the up-to-date position, as set out below.</p> <p>Outline Planning Permission at Richmond upon Thames College was granted on 16 August 2016 under application reference 15/3038/OUT for the re-development of the College's campus including, inter alia, a new ancillary 'Technical Hub' for Haymarket Media.</p> <p>A Reserved Matters application (reference 19/2381/RES) submitted pursuant to the Tech Hub Development Zone was submitted on 31 July 2019. That building was due to be occupied by Haymarket Media. However, Haymarket Media pulled out of their commitment to bring forward the Tech Hub development in 2020 prior to the determination of the Reserved Matters application. The application therefore remains live and undetermined, and the Technical Hub development will not come forward in the form envisaged.</p> <p>The Tech Hub Development Zone currently comprises the existing College’s Sports Hall. As a result of the changing circumstances therefore, the College are proposing to retain the existing Sports Hall whilst refurbishing and extending it.</p> <p>Therefore, a Technical Hub will not come forward at the site and as such, reference to the Technical Hub should be removed from Site Allocation 11.</p>
Jon Rowles	Site Allocation 11: Richmond upon Thames College, Twickenham	- text needs to be updated to reflect the redevelopment of the site that has taken place and the remaining land is just the vacant college building awaiting demolition, and the site is now in the ownership of a housing association.

Gary Backler, Friends of the River Crane Environment (FORCE)	Site Allocation 11: Richmond upon Thames College, Twickenham	FORCE has been engaged with this project since its inception. The Council should already be aware of our concerns with regard to this development, in particular the minimal enhancement so far delivered for the River Crane corridor, and the risk of over-use and degradation of Craneford West Field and Kneller Gardens as a consequence of the residential development. The Council should also be aware of our aspirations. These include measures to integrate Craneford West Field with the Challenge Court Meadow by the provision of a more pedestrian-friendly treatment for the end of Craneford Way and by closing off the one-way access from Langhorn Drive which is supposed to be for gym users only but for many years has been abused by others. The intention is to relieve some of the over-use already being seen at Craneford West Field by better use and integration of the facilities at Challenge Court Meadow. We have also stated our aspirations for improvements to both north-south and east-west pathways serving both the Duke of Northumberland’s River and the Crane as far as the Hospital Bridge Road and A316 underpasses. These points are also relevant to SA 12, SA 13 and SA 14.
David Wilson, Thames Water	Richmond Upon Thames College Egerton Road Twickenham TW2 7SJ	Thames Water Site ID: 61057 (Pending) Water Response The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development . Waste Response On the information available to date we do not envisage concerns regarding wastewater treatment capacity in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development . Additional Comments With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. “The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide ‘working near our assets’ to ensure your workings are in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.
	Site Allocation 12: The Stoop (Harlequins Rugby Football Club), Twickenham	
Vincent Gabbe, Knight Frank, on behalf of Harlequin Football Club Limited	Site Allocation 12: The Stoop (Harlequins Rugby Football Club)	Site Allocation 12 relates to The Stoop / Harlequins Rugby Football Club (The Site). Harlequin Football Club Limited (The Club) supports the inclusion of this Site Allocation, but objects in relation to three aspects of the proposed wording. By means of background, representations were submitted on behalf of The Club in April 2020 and June 2021 to the Local Plan Direction of Travel and Emerging Boroughwide Urban Design Study consultations. These representations set out the opportunity for a major mixed use redevelopment at the site and adjoining land. Copies of these representations are attached [See Appendix 3] and remain relevant in respect of the current draft Local Plan consultation. The first objection relates to the proposed building heights. The proposed site allocation, at the penultimate bullet point, cross-refers to the Urban Design Study and states that there is an opportunity in the mid rise building zone (5-6 stories) and then refers to compliance with Policy 45 (Tall and Mid Rise Building Zones). Within the Urban Design Study, The Harlequin Football Club site has been included in sub-area C2c, created specifically for The Site. The study states at Page 109 that this sub-area forms a discrete area standing in contrast to the low-lying residential setting. The area is considered more able to accommodate growth and change. This is an important acknowledgement that The Club agrees with. The adjoining Richmond College site is already subject to major change, delivering increased heights to the area, together with high quality architecture. The subject Site should continue this lead and build further on the opportunity created, for increased densities and high quality buildings. The Club believes that the site has potential to accommodate seven stories or more and should therefore be identified as an opportunity for 'tall buildings'. We note that other similar locations within the Twickenham area have been identified as suitable for tall buildings, including the Stag Brewery, Kew Retail Park and North Sheen / Lower Richmond Road. The representations submitted on behalf of the Club in April 2020 included an initial design concept for The Site, which indicate the scale of development considered suitable. This scale is considered to be sensitive to the setting whilst also making best use of the available land. The second objection relates to the proposed extent of the allocation. The Club owns additional land to the east of the proposed allocation, which has been excluded from the proposed allocation, due to the existence of a designated open space. The Club considers that instead, this area should be included and the allocation should make clear that there should be no loss in terms of the quantity and quality of open space. This would provide the flexibility for open space to be distributed through the proposed development so as to provide the most beneficial urban design solution. The current approach is inflexible and prevents a comprehensive approach to development of the area. The third objection relates to the area immediately south of the proposed allocation, which is occupied by the Twickenham Central Depot site, owned by the Council (The Depot Site). The initial design concept worked up by the Club and submitted in representations to the Local Plan in April 2020 (attached) [See Appendix 3], showed how the Depot Site could be included within the proposed allocation. This was on the basis that the site could potentially become surplus or be rationalised. Doing so would create significant marriage value between the two sites. It would also significantly increase the potential of the proposed allocation to deliver taller buildings, particularly to the centre of the Site. A statement should be made that, in the event that the whole or part of the Depot Site becomes surplus to requirement in the Plan period, it would be logical to extend the design brief for the allocation to include this land. The Club is seeking three changes to the proposed site allocation, as follows:

		<p>1. The pinultimate bullet point should be revised, to acknowledge that the site is suitable for a mix of medium and taller buildings, as shown in the vision drawings submitted by The Club. The draft Policies Map and Appendix 3 should also be updated to acknowledge this.</p> <p>2. The proposed site allocation boundary should be revised, to take in all of the land owned by The Club, including the area currently excluded to the east side. The policy could acknowledge the need to retain the current quantity and quality of open space in conjunction with this change.</p> <p>3. The Depot Site, to the south of the Club, should be included within the proposed allocation. The allocation should acknowledge that this area could be incorporated into the proposals if the existing facility was to becomes surplus or be rationalised.</p> <p>[See Appendix 3 for the Local Plan Representations from 2020 and the Urban Design Study representations from 2021]</p>
Richard Carr, Transport for London (TfL)	Site Allocation 12: The Stoop Twickenham	The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.
Gary Backler, Friends of the River Crane Environment (FORCE)	Site Allocation 12: The Stoop (Harlequins Rugby Football Club), Twickenham	<p>This site has a long frontage onto the Duke of Northumberland’s River. We trust that no development of the North Stand, nor indoor leisure, hotel, business or residential developments will be allowed to cause either shading, light or noise pollution of the DNR corridor. In particular, no air-conditioning or other plant should be located near the boundary with the DNR, as has been allowed at Twickenham Stadium. We would welcome a commitment by HRFC to engagement with or adoption of the stretch of the DNR onto which its stadium abuts, in line with best Environmental, Social and Governance practice.</p> <p>We note with concern the preparedness to consider residential development for this site. We would ask that the risks of imposing more crowding and wear-and-tear onto Craneford West Field and Kneller Gardens be given equal weight to consideration of “other sporting and associated uses” in deciding whether or not residential housing is an appropriate development for this site. Any further residential development strengthens the case for opening up the Challenge Court Meadow to public access and integrating it with Craneford West Field.</p>
Christine Duke	Site Allocation 12: The Stoop (Harlequins Rugby Football Club), Twickenham	<p>- Do not agree with proposals re hotel and business uses and do not agree with proposal regarding further housing development in the area.</p> <p>- And especially do not agree regarding the proposal for mid-rise buildings of (5-6 storeys) being identified as beneficial for this site, as would cause significant cramming, and overdevelopment very close to that already proposed/underway at Richmond College site.</p>
	Site Allocation 13: Twickenham Stadium, Twickenham	
Richard Carr, Transport for London (TfL)	Site Allocation 13: Twickenham Stadium, Twickenham	The allocation states that there is a need to retain sufficient parking, particularly for coaches. This should be rephrased to make it clear that although coach parking should be provided, car parking for employees or spectators should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance. The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.
Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	Site Allocation 13: Twickenham Stadium, Twickenham (and Place Based Strategy for Twickenham, Strawberry Hill & St Margarets)	<p>On behalf of our client, the Rugby Football Union ('RFU'), please find below a detailed response to Part C of the Draft Local Plan Pre-Publication Consultation Response Form. These representations primarily relate to Site Allocation 13 (SA13) (Twickenham Stadium, Twickenham) which covers 12.62 hectares of land in RFU's ownership. The extent of SA13 is provided as Figure 1 below.</p> <p>Throughout this letter, suggested additions or amendments to policy text are shown in red, and suggested deletions are shown with strikethrough.</p> <div data-bbox="1012 972 1617 1400"></div> <p>Figure 1 – Site Allocation 13</p> <p>SITE ALLOCATION</p> <p>The RFU strongly support the inclusion of an allocation which reflects the strategic nature of the site and welcome the suggestion of a working partnership with the Council to develop a Masterplan for the site and its long-term development. To this end, we provide the following comments and suggestions with respect to the current drafting of the allocation.</p> <p>Site Proposal</p> <p>As drafted, the Site Proposal (p.69) states:</p> <p><i>"The Council supports the continued use and improvement of the grounds for sports uses. Appropriate additional facilities including new stands, indoor leisure, hotel or business uses, as well as hospitality and conference facilities, may be supported provided that they are complementary to the main use of the site as a sports ground".</i></p> <p>Twickenham Stadium is the home of England Rugby, the largest dedicated rugby union venue in the world and one of London's premier entertainment venues. As drafted, the Site Proposal focuses on sports uses and does not acknowledge the stadium's role as one of London's premier entertainment venues. Non-sporting uses such as concerts are an important part of running a stadium of national importance and have become a vital part of revenue generation.</p> <p>The RFU's 2019/20 and 2020/21 Annual Reports highlight the impact of COVID-19. The Financial Review within the Annual Report 2021 reports that compared to pre-pandemic forecasts, the RFU's underlying revenues for the year ending 30 June 2021 are 60% lower than its pre-pandemic forecast. The revenue generation of non-sporting events is now more important than ever, in post-pandemic recovery.</p> <p>As context, ten-year event data provided by the RFU confirms that 15 of the 208 major events held were entertainment rather than Rugby events. The frequency of events and revenue generated by concerts is currently limited by a concert capacity limit of 55,000 as well as the number of concerts allowed per annum.</p>

		<p>The context for the allocation states that the Council will work with the RFU to understand the potential need for new and complementary facilities such as hotel, leisure centre, training facilities as well as hospitality and conference facilities. It notes that the applicant will have to demonstrate that the additional facilities do not lead to harmful impacts on the vitality and viability of Twickenham Town Centre, which are fully understood.</p> <p>Further to the new and complementary facilities included in the draft allocation, we would request specific reference to food and beverage and retail that is ancillary and complementary to the stadium use as a sport and entertainment venue, and subject to a management plan in line with Draft Policy 19 (Managing Impacts).</p> <p>This would enable development of additional facilities to cater for the stadium's visitors and generate local economic benefit. Depending on the scale of any retail proposed, it is understood that this would be subject to retail impact assessment to demonstrate no harmful impacts on the Town Centre in line with the NPPF and relevant PPG related to the sequential test and impact test, as well as the relevant Local Plan policy (Draft Policy 18 (Development in Centres) Part F) which sets out the Council's requirements for proposals outside designated town centres.</p> <p>We propose that the Site Proposal (p.69) is reworded as follows:</p> <p><i>"The Council supports the continued use and improvement of the grounds for sports and entertainment uses. Appropriate additional facilities including new stands, indoor leisure, hotel or business uses, as well as food and beverage, appropriate retail, hospitality and conference facilities, may be supported provided that they are complementary to the main use of the site as a sports and entertainment venue ground".</i></p> <p>Within the context section of the allocation it currently references the general need for new office floorspace in the borough and states that, in the event of an area of the site being declared surplus to requirements, the opportunity to provide for employment floorspace, such as offices or a business park, should be firstly explored. We would propose that more compatible, active uses such as those set out above take priority over office space in this location.</p> <p>We consider that office space could detract from, rather than enhance, this nationally important sporting and entertainment venue. Further, this provision does not accord with Draft Policy 23 (Offices) which states that major new office development should be directed within the five town centres and smaller scale office development should be in suitable locations such as the designated Key Business Areas.</p> <p>We therefore propose that the following text is removed/inserted:</p> <p>"There is a general need for new office floorspace in the borough and in the event of an area of the site being declared surplus to requirements, the opportunity to provide for employment floorspace, such as offices or a business park, should be firstly explored. A mixed use scheme, which may include residential including affordable housing, may also be considered appropriate provided that other sporting/entertainment and associated uses, including employment, have been fully investigated and that the mixed / residential use is compatible with the main use of the site, i.e. a national stadium, also taking into account the presence of the existing sewerage treatment works to the north of the site and residential amenity."</p> <p>[See also comments in respect of Metropolitan Open Land and other policies]</p> <p>Parking</p> <p>RFU agree with the statement within the site proposal context, <i>"to retain sufficient parking, particularly for coaches, servicing facilities and space for spectators and related services"</i>. It is essential that the existing parking is retained for the stadium uses only, and is not utilised as overflow from surrounding uses (such as school overflow parking).</p> <p>RFU understand that any further development and expansion would be subject to the relevant strategic and local planning policies promoting towards car-free / car-lite development, although would highlight the unique operational use of the site which will need a strategy to be adapted accordingly.</p> <p>Design objectives</p> <p>The Urban Design Study 2021 locates the Twickenham Stadium complex within the Twickenham Residential character area, which is primarily characterised by Victorian residential properties located to the south of the stadium beyond Whitton Road and Chertsey Road. To the west is the Whitton and Heathfield Residential area, which is characterised by a suburban character and 1930s semi-detached terraced housing.</p> <p>The Stadium comprises an 82,000 seat stadium, along with associated uses such banqueting and conference facilities, a ticket office, a retail shop, a museum, a gymnasium and a hotel. The existing stadium is equivalent to 13 storeys in height.</p> <p>SA13 states that design objectives and general guidance relating to the local character of the area, which any redevelopment proposals should have regard to, is set out in the Urban Design Study 2021 in the character area profile and design guidance for C2 Twickenham Residential and the Twickenham Village Planning Guidance SPD.</p> <p>However, the height of the existing stadium at 13 storeys, and the land uses identified within the current site allocation (SA11) and emerging site allocation (SA13) are distinct from the traditional residential typology to the south. Whilst we acknowledge that the Urban Design Study references the stadium as an area which is more able to accommodate growth and change, we consider that the stadium merits and would benefit from its own character area, and note that there are character areas defined in the borough of a similar size.</p> <p>CBRE made representations during the Council's consultation on the Urban Design Study in June 2021, on behalf of RFU. The representations set out reasons why the Twickenham Stadium (SA11) ought to form its own distinct character area, potentially in combination with SA14 to the west.</p> <p>Notwithstanding the above, we note that the Urban Design Study (p.109) acknowledges that Twickenham Stadium and its surrounds (sub-area C2b) forms a discrete area standing in contrast to the mostly low-lying, residential setting. It further states that there may be areas more able to accommodate growth and change, where these take opportunities to improve negative qualities and are designed sensitively to respect and enhance existing character. This acknowledgement is supported by RFU and we request this is properly reflected in the Site Allocation 13 and Place-Based Strategy 8 (Twickenham, Strawberry Hill and St Margaret's).</p> <p>RFU would support an approach to stepping down in massing from the stadium to provide integration with the wider low-rise context to the sought as is suggested in the design guidance.</p> <p>Summary</p> <p>The RFU support the prospect of working in partnership with the Council to develop a Masterplan the Twickenham Stadium site and its long-term development. To this end, these representations provide comments and suggestions with respect to the current drafting of the allocation and relevant other policies.</p>
Gary Backler, Friends of the River Crane Environment (FORCE)	Site Allocation 13: Twickenham Stadium, Twickenham	<p>This site has a 700-metre frontage onto the DNR. We trust that none of the “additional facilities including new stands, indoor leisure, hotel or business uses, as well as hospitality and conference facilities” will be allowed to cause either shading, light or noise pollution of the DNR corridor. In particular, no further air-conditioning or other plant should be located near the boundary with the DNR, to add to the noise and light pollution that has already been allowed here. The opportunity should be taken to relocate the existing plant away from the DNR corridor into which it intrudes visually and aurally today. We would welcome a commitment by the Rugby Football Union to engagement with or adoption of the stretch of the DNR onto which its stadium abuts – one of the finest stretches of the DNR – in line with best Environmental, Social and Governance practice.</p> <p>We note with concern the preparedness to consider residential development for this site, as there is no green space in the immediate vicinity. Any such development would add to the risks of imposing more crowding and wear-and-tear on Craneford West Field and Kneller Gardens. We welcome the condition that “any development proposal is required to protect and, where possible, enhance, the Duke of Northumberland River, including access to it, and the associated MOL.” We note that new planning regulations require environmental enhancement and not just protection and consider that the wording in all the Site Allocations (e.g. SA 14 below) should be updated to reflect this.</p>

Christine Duke	Site Allocation 13: Twickenham Stadium, Twickenham	Both agree and disagree. Do not agree with the supporter capacity being increased at the RFU / Twickenham Stadium, there is already significant congestion and disruption on rugby fixture days. The existing capacity of 82,000 is more than our local area can easily and adequately cope with, and the number of fixtures have dramatically increased over the last decade, shutting down residents options over more weekends throughout the year. There are only 52 Saturdays in any given year. Would agree with improvements to hotel facilities for appropriate uses and indoor sports activities.
Jon Rowles	Site Allocation 13: Twickenham Stadium, Twickenham	- the council appear to have carried over text from previous local plans about the new hotel, leisure centre, hospitality and conference facilities. These have been delivered and this paragraph should probably be deleted. Whitton Brook runs under the site, and the proposal should seek to have this uncovered.
	Site Allocation 14: Mereway Day Centre, Mereway Road, Twickenham	
Tom Dunbar	Site Allocation 14: Mereway Day Centre, Mereway Road, Twickenham	Myself (and others) in Barneby Close would be willing to buy part of the site to offset the cost of a local amenitiy. We are happy to discuss this directly with yourself. The site has been disused for many years, is known for poor subsistance / flooding issues, and has poor links to public transport. Moreover, it does not have good road access or parking (e.g. Mereway / Gould Road is already too bust and dangerous given the number of schools in the immediate vicinity). The site would benefit from: - being used in part or in full for public good, so long as it does not further the challenges listed above (e.g. strain on road). - being used as a green space - as it naturally sits in an area that naturally extends from the Mereway Nature Reserve (and is identified as a key area for certain species e.g. bats). There may well be so low impact options that could suit a wider purpose if (the prefered) option of turning it into a green space is not possible: - low-rise (E.g. single storey) utility for education (e.g. a school classroom) or nursery - sell part of the land to Barneby Close to offset the cost. The land would not require access as it could be an extension of existing land that backs on to the site.
Christine Duke	Site Allocation 14: Mereway Day Centre, Mereway Road, Twickenham	Agree with the site proposals for this site, social and community as was.
David Wilson, Thames Water	Mereway Day Centre, Mereway Road, Twickenham	Thames Water Site ID: 49786 (Reviewed Oct17) Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Additional Comments With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.
George Goodby, Environment Agency	Place-based Strategy for Twickenham, Strawberry Hill & St Margaret's Site Allocation 14: Mereway Day Centre, Mereway Road, Twickenham	We are pleased to see a desire to protect and enhance the River Crane as part of any development of this site. The River Crane does not currently achieve good ecological potential as required by the Water Framework Directive. There should be a commitment to 20% net gain for the river as part of any development, and this should be measured using the River section of the DEFRA Biodiversity Metric. It is one of the stated aims of the Lower River Crane Restoration Strategy ’s Vision Document to make space alongside the open concrete channel of the Lower River Crane, so that it can be broken out of its concrete channel and re-naturalised. Any development on this site should contribute to these objectives and liaise with the Crane Valley Partnership.
Mary Egan	Site Allocation 14 - Mereway Day Centre	I would object to redevelopment for a social or community infrastructure use here because of the congested traffic/parking in Mereway Road and dangerous junction at Gould Road and no possible access to public transport. The same reasons apply to affordable housing. Currently the area is very densely packed with a warren of small houses, owners sometimes having two cars. In my opinion, the optimum use of the land would be to extend the Mereway Nature Reserve/Kneller Gardens. The possibility of a one storey nature classroom for children, sympathetically designed, would be a second line of approach. Changes considered necessary: There is a statutory requirement to leave an 8m undeveloped corridor and LP18 states the planning policy on River Corridors - "Development adjacent to the river corridors will be expected to contribute to improvements and enhancements to the river environment." LP18C(C). There is an also an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside. "Where appropriate, developments alongside and adjacent to the River Crane should contribute to the overarching arm of creating a new metropolitan park that provides a continuous, accessible link between Hounslow Heath and the River Thames, incorporating river restoration along the lower Crane, including a long distance footpath, improved access for surrounding communities and and enhanced wildlife corridor" I would expect the Plan to reflect these aims. The construction of the Fish Pass is a great tribute to the Environment Agency and the Borough - sensitive approach to its surrounding environment would be extremely valuable.
Gary Backler, Friends of the River Crane Environment (FORCE)	Site Allocation 14: Mereway Day Centre, Mereway Road, Twickenham	If this site is to be used for social or community infrastructure, we would support the inclusion of a River Crane-focused element. This could range from some interpretation boards right up to a river garden or even an Ecology Centre, as is the ambition for the new Northcote Nature Reserve in St Margaret’s. We support the test that “Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme...be considered” and we welcome the requirement that “Any development proposal is required to protect and, where possible, enhance the River Crane corridor.” We would like to see public access to this bank of the Crane provided at this location as part of any redevelopment. Particularly in the context of potential residential developments on Site Allocations 12 and 13, the Council could consider leaving this entire site undeveloped, as a completely new publicly accessible green space, to complement and provide some relief for Kneller Gardens.
	Site Allocation 15: Station Yard, Twickenham	

Richard Carr, Transport for London (TfL)	Site Allocation 15: Station Yard, Twickenham	We welcome the reference to bus stands. However, the requirement that bus stands should be retained, redeveloped or re-sited in a suitable location needs to be clarified. If bus stands are redeveloped or re-provided this should only be with the agreement of TfL and standing capacity (as well as drivers’ facilities) must be maintained and enhanced.
Luke Burroughs, Transport for London (TfL) Commercial Development	Site Allocation 15: Station Yard, Twickenham	Site allocation 15: Station Yard It is welcome that this site allocation includes the TfL landholding. This land has ongoing operational requirements as a bus stand on days when there are events at Twickenham Stadium. However, as recognised in the allocation, should a suitable replacement location be found for this bus stand it will enable development to come forward on this site. A map of this site allocation can be found in appendix 1. [The map was not enclosed, but maps were provided previously to the Call for Sites and are published in the Schedule of Call for Sites all responses received – Appendices (page 3)]
Christine Duke	Site Allocation 15: Station Yard, Twickenham	Agree/disagree, housing development could reduce possibility of using this site for freight transportation by rail in the future as would ease congestion/pollution etc.
David Wilson, Thames Water	Station Yard, Twickenham TW1 4LJ	Thames Water Site ID: 63064 (APPROVED - 03/03/21) Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Additional Comments With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. There are easements and wayleaves running through the Site. These are Thames Water Assets. The company will seek assurances that it will not be affected by the proposed development. There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes .
	Site Allocation 16: Twickenham Telephone Exchange	
Christine Duke	Site Allocation 16: Twickenham Telephone Exchange	Agree/disagree. This preused site could be purposed solely for housing needs as those are significant, retail and commercial buildings / shops etc. available to rent at the moment in close proximity to the old Twickenham Telephone exchange building.
David Wilson, Thames Water	Twickenham Telephone Exchange	Thames Water Site ID: 71999 Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Additional Comments The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. “The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide ‘working near our assets’ to ensure your workings are in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.
	Site Allocation 17: Twickenham Police Station	
Vincent Gabbe, Knight Frank, on behalf of the Metropolitan Police Service	Site Allocation 17: Twickenham Police Station	Proposed Site Allocation 17 (Twickenham Police Station) sets out details of what proposals would be acceptable if the Metropolitan Police Serve were to vacate Twickenham Police Station and dispose of it. However, the MPS Estates Strategy confirms that this property is to be retained. The policy is therefore unnecessary and may cause confusion for local stakeholders as to the strategy for policing in the area. Proposed Site Allocation 17 (Twickenham Police Station) should be removed from the draft plan.
Christine Duke	Site Allocation 17: Twickenham Police Station	Needs to be kept as a working Police Station, every town centre should have one.
	Site Allocation 18: Twickenham Riverside and Water Lane/King Street	
EE McClelland	Place based strategy for Twickenham: Twickenham Riverside and Water Lane/King Street	I have concerns about the quantity of housing and retail being placed on this site. In keeping with your stated aims I believe this site should be more about providing public access and preserving or reinstating river habitat and a diverse range of settings for the public to enjoy. The current plan lacks biodiversity and is at risk of becoming a sterile paved plaza hemmed in by much too tall buildings.
Richard Carr, Transport for London (TfL)	Site Allocation 18: Twickenham Riverside and Water Lane/King Street	We welcome the suggestion that ‘ <i>There should be a comprehensive approach to servicing and delivery, along with exploring the opportunity to improve the environment of the Embankment through a reduction in car parking.</i> ’ This could be more directly worded to state that any redevelopment would be expected to remove car parking on the Embankment.


David Marlow	Site Allocation 18: Twickenham Riverside and Water Lane/King Street	P79 (Site 18). Twickenham Riverside - to suggest that Council is offering improvement/enhancements to Diamond Jubilee Gardens as an option is clearly absurd. This was never an option to us in lots of public consultation but would have been very welcome. £4 million is being spent on fees alone for this multi million pound vanity project (costs are currently a secret). The current public toilets are reduced to a mere 'aspiration'. A disgraceful CPO has been issued against the Trust whose own surveyors say reprovision is inferior to current. The new traffic scheme is dangerous - the Councils own consultants say two-way working in both Wharf Lane and Water Lane... risks collisions, with vulnerable road users - pedestrians and cyclists. This beggars belief!
Christine Duke	Site Allocation 18: Twickenham Riverside and Water Lane/King Street	Please do your very best regarding development of this site. Please ensure that it will be special for everyone and not just the privileged few.
Michael Atkins, Port of London Authority (PLA)	Site Allocation 18: Twickenham Riverside and Water Lane/King Street	In principle support allocation [18 Twickenham Riverside], particularly with regard to bullet point 9 which states that any proposal should seek to maintain the embankment as a working quay, provide mooring and landing facilities, and consider the impact on the character and function of Eel Pie Island. This is particularly important given the number of operational boatyards present on Eel Pie Island which in line with London Plan policy SI15 (Water Transport) should be protected. Also support the wider policy wording for Twickenham, Strawberry Hill & St Margarets which states that future development in this area is expected to contribute to protecting, enhancing and making the most of the character of the built and open environment, including the River Thames riverside and associated river related activities and Twickenham working waterfront. This is also in line with policy SI15 of the London Plan.
Katy Wiseman, National Trust	Site Allocation 18: Twickenham Riverside and Water Lane/King Street	Ham House is located to the east on the opposite side of the River Thames to proposed Site Allocation 18: Twickenham Riverside. We note that this allocation is for a comprehensive mixed-use redevelopment of the site, which includes a large area which is currently derelict. Whilst this presents a significant opportunity to improve and regenerate the area, it is imperative that it is carefully designed to minimise any visual impact on the wider area, including Ham House. In line with the Urban Design Study 2021, development on this site should also conserve key views and vistas to nearby green space and landmarks along the river. This may require a restriction to be placed on the height of new buildings in this location and we recommend that this is clearly set out within any future policy wording for this allocation. Changes considered necessary: It is imperative that development is carefully designed to minimise any visual impact on the wider area, including Ham House. In line with the Urban Design Study 2021, development on this site should also conserve key views and vistas to nearby green space and landmarks along the river. This may require a restriction to be placed on the height of new buildings in this location and we recommend that this is clearly set out within any future policy wording for this allocation
Jon Rowles	Site Allocation 18: Twickenham Riverside and Water Lane/King Street	- This site was originally a park, and then an open-air lido was built on part of the site, most of which was then converted back to a public park (Diamond Jubilee Gardens). I do not agree that flats should now be built on Diamond Jubilee Gardens. The Council is arguing that somehow a row of shops and a pub will have a large regenerative impact on Twickenham. However, the building footprint is modest and not big enough to drive footfall in its own right and nor is the proposed architecture and landscaping of a distinction likely to attract large numbers of visitors either. The viability plan shows that the proposed development will need over ten million pounds of subsidy on top of the housing subsidies already proposed. Therefore the inspector's findings in the previous Twickenham Area Action Plan probably still stand and the council should provide detailed justification on why they want to depart from the TAAP inspection findings
Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Place-based strategy for Twickenham, Strawberry Hill and St Margarets	The wider aims and visions for Twickenham, Strawberry Hill and St Margaret's in terms of the provision of office floorspace and new flexible workspaces within town centres are generally supported. However, we object to a blanket approach to the intensification of existing employment sites which does not consider site specific circumstances, appropriateness for intensification, nor the aim to create vibrant, active and mixed-use town centres. We also consider that that this strategic policy (8) is poorly evidenced and inadequately supported by accompanying development management policies to successfully achieve the draft vision. In particular, this place-based strategy shows the Site as lying within the "Fullwell and West Twickenham Residential Area" which is identified as being of medium sensitivity to change with some potential for positive change. It is also described as possessing " <i>a less coherent character than other areas in the borough, therefore the strategy is to improve the character of the area, with future new development and creation of landmarks taking opportunities to add new character and sense of place</i> ". Logically, it can therefore be deduced that the majority or a large number of the 1,100 – 1,200 new dwellings identified for Twickenham (as detailed in draft Strategic Policy 10) will be delivered within this character area. However, conflictingly only one of the nine draft site allocations for Twickenham, Strawberry Hill and St Margarets is located in the Fullwell and West Twickenham Residential area, and this draft site allocation (14) is for community use. In addition, none of the draft Site Allocations include indicative housing capacities, and the need for new housing is largely absent from draft Strategic Policy 8 (as worded). We therefore encourage the Council to re-word this strategic policy with a greater emphasis on housing delivery and the inclusion of additional site allocations, such as the Greggs bakery, to ensure that the housing target in Strategic Policy 10 is met and the growth aspirations for this part of the borough are realised.
George Goodby, Environment Agency	Place-based Strategy for Twickenham, Strawberry Hill & St Margarets Site Allocation 18: Twickenham Riverside and Water Lane/King Street – Twickenham, Strawberry Hill and St Margarets.	This site is located in close proximity to the Tidal Thames statutory flood defences. Bullet point 10 references flood defence improvement and upgrading works. We strongly support this but recommend removal of the term 'where viable' as these works are necessary for the site to demonstrate it is 'safe for its lifetime' and does not 'increase flood risk elsewhere' in line with the NPPF Paragraph 159. We would also recommend that this bullet point references improved flood defence maintenance access as a requirement. As a recommendation, bullet point 10 could be re-worded to say 'Due to its location on the banks of the River Thames, flood defences and maintenance access should be upgraded and improved. Works should be informed by discussions with the Environment Agency. A Riverside Strategy Approach should be adopted to deliver multiple benefits to flood risk, biodiversity and public realm'. Recommended action: We recommend you update the wording to context bullet point 10 of Site Allocation 18. Natural Flood Management techniques should be incorporated into any upgrade of the flood defences where possible. This could include a consideration to reengineer the riverbank, applying softer engineering approaches. The use of natural flood management techniques would also help any development at the site achieve the net gain requirements as outlined in Policy 39 .
	Place-based Strategy for Whitton & Heathfield	
Jon Rowles	9 Whitton & Heathfield	Does not address the main 20-minute neighbourhood challenge facing the area is a lack of local employment resulting in the vast majority of people having to travel out of the area for work and when it comes to leisure, there is very little in the way of entertainment, culture or restaurants. This makes W&H one of the most car-dependent areas of the borough. There is a need to explore how the three railway bridges on Hanworth Road, Hospital Bridge Road and Nelson Road can be adapted so there are reasonable pavements and facilities for cyclists. I note that Ham, Petersham and Richmond Park have a strategy for a new bridge and it seems odd that the identified need for better bridges in Whitton has not made it to the local plan.
Joan Gibson	Comments regarding Heathfield and Whitton wards	Last but not least - I cannot find this document this time around - but there is a document describing wards and what is important about them. The Heathfield and Whitton wards were not given much praise, but a key aspect of the Heathfield ward was missing. The Heathfield ward is fairly unique in the UK as it has low cost or social housing right next to parks such as Heathfield Recreation Ground and Hounslow Heath. This is key in reducing inequalities in access to green spaces and, encouraging health and wellbeing for people on low incomes. This aspect of the Heathfield ward needs to be recognised, protected and used as an example for the rest of the borough.
Emma Penson, DWD on behalf of Dukes Education Group and Radnor House School Limited	Place-based Strategy for Whitton & Heathfield	Disagree with: 1) The Vision for Kneller Hall which states that: "There are some development sites that provide the opportunity to develop new character, including to ensure Kneller Hall will lie at the heart of the Whitton community, through a viable long-term use protecting its heritage significance and opening up the site to include community uses along with a new public park". 2) The statement within the Policy section which states that "Open spaces that are currently not publicly accessible, such as Kneller Hall, will be encouraged to make them available for public access and use".

		3) The statement at the end of the Policy section where Site Allocation 20 is discussed and which states: "with the opportunity to open up for community access including a new public park offering recreation and leisure as well as informal play and wildlife habitats". For the reasons set out in the attached letter prepared by DWD dated 31 January 2022 that accompanies this submission, the site cannot provide a new public park or be publicly accessible. Any access for the community must be managed, to ensure the safety of pupils at the site. [See comment in relation to site allocation]
Lynda Hance	Place-based Strategy for Whitton & Heathfield	It's out of date already: 3 In the Whitton/Heathfield section I could find no mention of how you intend to address the provision to realise the borough's ambition for all cars to be electric in a very few years' time: you need to have plans for every lamp post to be converted to a charging point, because the majority of roads don't have the space for parking and allocated charging points. 4 Turing House school will have a major detrimental impact on transport in/through Whitton, yet no mention is made of alleviating this in the short term; current road layout amendments have merely 'prettified' the two junctions in Hospital Bridge Road where roundabouts would have made more sense. You need to add provision for a transport review in the short term.
	Site Allocation 19: Telephone Exchange, Ashdale Close, Whitton	
David Wilson, Thames Water	SA 13 Telephone Exchange, Whitton	Thames Water Site ID: 54327 Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Additional Comments With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water and aim for greenfield runoff rates we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.
Jon Rowles	Site allocation 19: Telephone Exchange, Ashdale Close, Whitton	- I suggest that a requirement to provide for an extension to the Library Way carpark is added as this will enable some car parking to be decanted from the high street and other areas that will reduce curbside conflict and enable the increased provision of cycle lanes.
	Site Allocation 20: Kneller Hall, Whitton	
Katie Parsons, Historic England	Site 22: Kneller Hall	We note that an SPD for this site was adopted in 2020 and that this was accompanied by a heritage assessment. We welcome the emphasis upon the reuse of historic buildings within the site. The analysis in the heritage statement helps form a useful baseline to determine how the site might be taken forward in a sustainable manner. When we commented on the draft SPD in 2019 we noted that the area currently identified for greatest potential change includes at least one building (the Band Practice Room) that has been identified as being curtilage listed and is ascribed moderate heritage significance, which could benefit from further analysis. Reference should be made to the presence of this curtilage listed building to avoid issues arising further along in the planning process. The site is located within a Tier 2 Archaeological Priority Area, a Desk Based Assessment, and potentially pre-determination fieldwork, will be required to support future development proposals. There is below-ground potential for a medieval moated enclosure and the remains of medieval Whitton. Nearby sites have revealed evidence for prehistoric and Roman activity, so it's possible that there will be remains pre-dating the medieval moated site and settlement. The post-medieval landscape garden remains associated with Kneller Hall should also be taken into account in design proposals. GLAAS should be consulted at an early stage to advise on place making and public benefit.
Gary Backler, Friends of the River Crane Environment (FORCE)	Site Allocation 20: Kneller Hall, Whitton	We support the requirement that “Any redevelopment of the scheme should provide habitat enhancement through the creation of an east-west habitat corridor.” We would like an explicit requirement to de-culvert and naturalise Whitton Brook, which would have temperature-cooling, flood-attenuation and ecological benefits.
Vicky Phillips, Habitats & Heritage	Site Allocation 20: Kneller Hall, Whitton p83	We support the provision of public open space put forward in the Kneller Hall SPD linking to the wider work being done to improve access to the Duke of Northumberland River by the Crane Valley Partnership and others. We hope the recent sale to Radnor House School will not interfere with this vision.
Lynda Hance	Site Allocation 20: Kneller Hall, Whitton	It's out of date already: 1 The sale of Kneller Hall to Radnor School is agreed and progressing, yet the plan is written as though the future of Kneller Hall is unknown and the plan speculates on what the site development might be.
Jon Rowles	Site Allocation 20: Kneller Hall, Whitton	- I oppose the idea that a residential quarter is built on the western edge of the site. This would result in pressure to build on some of the Metropolitan Open Land in time. There is a clear pattern of schools having to expand as the school curriculum expands and the school will need space to adapt over the coming years. The site also has clear heritage value, and cramming in more residential accommodation in the western area will have a negative impact on the setting of the listed Kneller Hall and listed boundary wall.
Emma Penson, DWD on behalf of Dukes Education Group and Radnor House School Limited	Site Allocation 20: Kneller Hall, Whitton	DWD has been instructed to submit representations on behalf of Dukes Education Group and Radnor House School Limited on the Draft Local Plan Pre- Publication Regulation 18 Consultation. The submission comprises of this letter and a completed ‘Response Form’. It focuses on our client’s interest in Kneller Hall, 65 Kneller Road and draft ‘Site Allocation 20: Kneller Hall, Whitton’. This letter sets out: <ul style="list-style-type: none">• The ownership of the Kneller Hall site;• Background to Dukes Education Group and Radnor House School;• The site owner’s proposals for Kneller Hall; and• A response to the draft Site Allocation 20, in the context of our client’s proposals for the site. Kneller Hall’s Ownership The site was formerly a Royal Military School of Music, which included residential accommodation and was owned by the Ministry of Defence (MOD). They vacated the site in Summer 2021. The freehold interest of the entire site, totalling 9.7 hectares, was acquired by Radnor House School Limited, which is part of the Dukes Education Group, from the MOD in quarter 3 of 2021. Pre-application discussions are taking place with the London Borough of Richmond (LBR) in connection with our client’s proposals to convert the site to a day school (ref. 21/P0412/PREAPP). A planning performance agreement has also been entered into with LBR. Dukes Education Group and Radnor House School Dukes Education is a family of UK nurseries, schools and colleges united by a common purpose; to give children the foundations for an extraordinary life through education. Founded in 2015 by its chairman Aatif Hassan, Dukes Education has 23 schools and colleges, and 20 nurseries, with sites across London, Cambridge, Kent, and Cardiff.

		<p>Dukes Education also owns and runs wraparound advisory services and summer schools at each stage of the education journey, from academic summer schools to university application consultancy services. Dukes is a dynamic, future-focused organisation committed to providing a gold standard of education for young people in the UK.</p> <p>Dukes have significant experience operating schools in listed buildings and restoring listed buildings. In recent years, Dukes Education converted a Grade II listed office building in the London Borough of Hackney to a primary school, for The Lyceum School. In the City of Westminster, a Grade I listed building at 106 Piccadilly was converted to facilitate occupation by Eaton Square School. Eaton Square School also occupy a number of other listed properties within the City of Westminster. The existing Radnor House School, at Pope’s Villa, Cross Deep falls within the Grade II listed Pope’s Garden parks and gardens designation.</p> <p>Radnor House is part of the Dukes Education Group. Radnor House is an independent selective co-educational day school, currently located at Pope's Villa, Cross Deep, Twickenham, London, TW1 4QG. Radnor House pupils learn in small classes with a strong focus on individual attention. The school educates girls and boys from ages 9 (Year 5) to 18 (sixth form), with three main entry points in Year 5, Year 7 and Year 12.</p> <p>The existing school is approximately a 1.6 mile walk south-east of Kneller Hall. The school is currently at full capacity. The school’s Department for Education capacity is 440 pupils. This is also the pupil capacity approved under planning application reference 12/4030/VRC.</p> <p>The school wishes to expand, to enable it to improve the facilities that it provides to existing students and also to further grow the school. Dukes Educations has been searching for a suitable additional property in the local area for a number of years.</p> <p>It is proposed that all pupils in Years 7 to 11 and in the sixth form, who are currently located at Pope’s Villa, will be relocated to Kneller Hall. Whilst initially the school will only accommodate pupils that have moved across from the Pope’s Villa site, each year the school will grow in size, with additional forms being introduced. It is expected that the Kneller Hall site will have capacity for up to a total of 750 pupils.</p> <p>Pope’s Villa will then solely be used for Year 5 and 6 pupils (junior school). The school will grow in size and will be a junior school to accommodate up to approximately 300 pupils.</p> <p>The two sites will be self-contained, providing all the facilities that pupils require and therefore pupils and staff will not need to move between the existing and proposed site. However, pupils at the Pope’s Villa site, will travel on minibuses to Kneller Hall to access the proposed sports facilities.</p> <p>Approximately 90 of the circa 100 staff members at Radnor House currently employed to support the existing Year 7 to 11 and sixth form will move across to Kneller Hall. Further staff will be employed at Kneller Hall as pupil numbers increase. It is expected that there will be circa 50-60 additional staff members employed at Kneller Hall working across teaching, maintenance, catering and groundskeeping, resulting in a total of circa 150 staff at the Kneller Hall site, once the site reaches capacity. It is expected that there will be circa 30 staff in total employed at Pope’s Villa, when it is the junior school use only operating there. Therefore, across the two sites there will be a significant range of employment opportunities, with a net increase of circa 80 jobs across both sites.</p> <p>Proposals for Kneller Hall</p> <p>Our client’s current draft masterplan for the site proposes the following:</p> <ul style="list-style-type: none">• Use of the main Grade II listed Kneller Hall for Education Use (Use Class F1);• Use of Guard Room and Band Practice Hall for Education Use (Class F1).• Demolition of some of the existing modern buildings on the site and the conversion of other existing modern buildings to school use (Use Class F1);• New build development to provide new purpose-built school buildings, including indoor sports facilities (Use Class F1);• Ancillary works to facilitate the use of the site as a school to include high quality sports facilities and a Forest School programme; and• Facilitation of managed local school and community groups access to the outdoor sports and forest school facilities. A copy of the current draft masterplan is provided at Appendix 1 of this letter [See Appendix 4 to this schedule]. The key elements of the proposal will include: <ul style="list-style-type: none">• Restoration and maintenance works to Kneller Hall, the Guard Room and Band Practice Hall. The investment by Dukes Education into these buildings will facilitate the school use and also support the long term retention and protection of the heritage assets.• Conversion of two existing three storey buildings to the north of the existing Band Practice Hall, to provide teaching facilities, together with a 3 storey new build high quality infill link building, to provide additional teaching accommodation.• Removal of some of the modern piecemeal development that has taken place across the northern and western parts of the Site, to consolidate the built development.• Removal of existing modern buildings on the western part of the Site and the provision of a single building which will provide a multi purpose sports hall, indoor swimming pool and changing facilities.• Provision of outside sports pitches, including an AstroTurf pitch, together with ancillary changing/ storage facilities for these facilities on the eastern part of the Site. Managed access for other local schools and community groups will be facilitated by the school, to ensure that it is not only the pupils based as the site that can benefit from these facilities but also the local community.• Retention of the outside bandstand and provision of a performing arts and music hall, to retain the site’s historical musical legacy and provide an opportunity for music-based events and concerts to continue to be held at the site, including events that the public can be invited to.• Creation of a biodiversity corridor at the north of the site. This will include a Forest School programme based in an existing converted building and the creation of ecological spaces. The Forest School facilities will be able to be used by other local schools, to support the education of young people about the importance of the environment. <p>The new facilities at the site, provide the opportunity for collaboration between schools and community groups and the sharing of facilities. As part of the pre-application discussions, we will further discuss with the LBR, school/ groups that could benefit from this access and how this can be managed. Whilst our client is open to providing access to the sport and Forest School facilities, it must be managed in a way that ensures that its pupils are safeguarded and their own needs met.</p> <p>An initial structural and conditions survey of the listed building and curtilage listed buildings was undertaken by WSP in November 2021. This recommended further investigations, which are being undertaken. Set out below is a summary of the key issues that WSP identified:</p> <ul style="list-style-type: none">• Kneller Hall: A number of the basement walls were saturated with water damage visible to the wall finishes and therefore a waterproof render repair will be required. Numerous hairline cracks were noted in the finishes across the building. However, these are not deemed structurally significant and can be attributed to thermal movement and are relatively commonplace in buildings of this age. More significant cracks were observed to the internal masonry walls to the first and second floors of the West Wing of the building. It is noted that the cracked walls do not continue down to the ground floor and appear to be supported on the timber floor structure. Further investigations are required here. Further investigations to confirm the condition of the roof are also required. Aesthetic repairs will be required to the external elevations, which should be specified by an architect/stone specialist.• Guard’s Room: Water damage to the masonry walls to the Boiler Room. Waterproofing required to the location of water ingress. Further investigations into condition of roof and bell tower needed.• Band Practice Hall: Previous remedial works have been undertaken in 1971 to strengthen the perimeter walls. Concrete encased back-to-back steel channels were installed at the corner of each roof truss, with a horizontal steel tie rod to prevent any lateral thrust from the truss loading the wall. Significant cracking to one internal wall was identified. The cracks show a portion of the wall has dropped with mortar joints no longer lining up and is indicative of differential settlement in the wall. There is also minor cracking to the concrete encasement around the channel sections installed as part of the 1971 remedial works. Remedial work is required, including the installation of helibars and underpinning.
--	--	---

		<p>In addition to the structural issues identified, the Mechanical and Electrical services and internal fit out and condition of the properties must also be considered. The building and its services are tired and run down and the building services are beyond their economic life. The building services need to be overhauled. The properties require extensive restoration works to provide good quality accommodation, that meets modern standards.</p> <p>Significant financial investment is proposed by our client to ensure the long term retention and preservation of the Grade II listed Kneller Hall and the curtilage listed Guard Room and Band Practice Hall. Costs associated with the repair, restoration and fit out works required to these three buildings have been estimated by our client’s cost consultant to amount to circa £7 million alone. Further information on the investment and costs is provided in a letter prepared by the project cost consultant, LXA, at Appendix 2. [See Appendix 4 to this schedule]</p> <p>It is apparent from the advice provided by LXA that there are considerable costs involved in restoring Kneller Hall. The existing layout of the buildings lends itself well to an education use, given that the Military School of Music were also using this building for teaching purposes. If the building was proposed to be used for an alternative use, such as residential, this would require far more extensive and significant interventions and alterations to the building, than an education use requires. The proposed use as a school is therefore considered to be the optimum use for the building in heritage terms, as it will be restored, whilst minimising the extent of alterations and maintaining the building’s historic use, which dates back to the mid 1800s, for training and education purposes.</p> <p>Representations to Draft Local Plan Site Allocation 20: Kneller Hall, Whitton</p> <p>This section responds to question 10 and 11 of the LBR’s Response Form. The table below sets out the text from draft Site Allocation 20, together with our representations on these, where changes are needed and why these changes are needed.</p> <p>The Council’s aspirations for the site allocation must reflect and acknowledge the significant financial investment and commitment being made by our client, associated with the restoration and enhancement of the Grade II listed building, and also its ongoing maintenance and upkeep.</p> <p>Whilst our client wishes to work constructively with the Council on the delivery of the site, the Council’s aspirations must be commercially realistic and also acknowledge the constraints and limitations of the site. The site constraints include:</p> <ul style="list-style-type: none">• MOL designation covering the eastern part of the site.• Listed status of Kneller Hall, the boundary wall and the curtilage listed buildings and the requirement to retain these buildings and ensure that new build development is appropriate in their setting.• Extensive tree cover across large parts of the site.• Ecology and wildlife corridor along the site’s northern boundary.• Location proximate to a residential area. <p>[Details from table]</p> <hr/> <p>Site Area (ha): Draft Site Allocation 20: 9.72 Representations: The project architect has confirmed that they are in agreement that the site area is 9.7 hectares. Change Needed and Why: None.</p> <hr/> <p>Site Proposal:</p> <hr/> <p>Draft Site Allocation 20: Appropriate land uses include residential (including affordable housing), educational use, employment and employment generating uses as well as social infrastructure uses, such as health and community facilities.</p> <p>Representations: The policy recognises that a range of different land uses may be acceptable at the site, including educational uses and social infrastructure uses.</p> <p>The flexibility on the potentially suitable land uses that the policy acknowledges is considered appropriate. Our client’s proposals fall within the land uses considered to be appropriate.</p> <p>It is noted that the site has a number of development constraints, as a result of the site designations and therefore this limits the quantum of development possible at the site. It also limits the range of uses and also the number of different uses, that can feasibly be delivered.</p> <p>Change Needed and Why: None.</p> <hr/> <p>Draft Site Allocation 20: Any proposal should provide for some employment floorspace, including offices.</p> <p>Representations: The proposed education use will provide employment at the site, including teaching, administration, catering, groundmen, gardening and maintenance roles. It is expected that when the school reaches capacity, it will employ circa 150 staff at the site.</p> <p>It is not intended that separate office floorspace will be provided. The proposal to provide office floorspace conflicts with draft policy 23 Offices, which states that <i>“The Council will support appropriate new office development by the following means:</i></p> <ol style="list-style-type: none"><i>1. Major new office development should be directed within the five town centres</i><i>2. Smaller scale office development should be in suitable locations, particularly within the designated Key Business Areas as identified on the Policies Map”</i> <p>The site is not located in a town centre or a designated key business area. It is therefore not considered to be a suitable location for new office floorspace. The Employment Land and Premises Needs Assessment (December 2021) prepared for the Council by Stantec does not identify a specific need for office floorspace in this location. At paragraph 7.38 of the report it states that <i>“Richmond Town Centre is the Borough’s strongest and best location to focus any additional office growth, justifying prioritisation over Twickenham and the other centres where this explicit prioritisation of new office space would not be justified.”</i> The Assessment also notes that the Draft Local Plan’s office requirements may need to be updated to reflect a weaker office market, as a result of COVID- 19’s impact on working patterns, as it passes through examination.</p> <p>Change Needed and Why: It is considered that this sentence should be removed from the allocation entirely. For the reasons set out in the ‘Representations’ column, there is no justification for office floorspace to be required in this location and it conflicts with draft policy 23 which directs new office floorspace to town centre locations and key business areas. The site does not fall within either of these designations.</p> <p>The proposed education use at the site will provide employment opportunities and therefore it is not considered appropriate to deliver specific employment floorspace. The site is very constrained and the school needs the entire site to deliver their aspirations for the school use, there is not surplus land available for separate employment uses.</p> <hr/> <p>Draft Site Allocation 20: The Council will expect the playing fields to be retained, and the provision of high quality public open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green and open space, available to both existing and new communities.</p> <p>Representations: The existing playing fields on the far east of the site will be retained and used by the school, with more formalised sports pitches introduced, including an all- weather AstroTurf, to support the school’s sporting requirements. Managed access for other local schools and community groups to these facilities could also be provided.</p>
--	--	---



		<p>In order for the sports pitches to be useable, it will be necessary for a building providing changing, WC, shower and storage facilities to be provided on the east of the site, close to the sports pitches.</p> <p>The site is not currently publicly accessible and nor was it whilst the MOD occupied the site for the Military School of Music. Providing public open space and links through the site conflicts with the proposed school use, which must prioritise pupil safety and manage access.</p> <p>Our client is open to providing managed access to the outside sports pitches, so that the sports pitches, and associated ancillary facilities, can be used by local schools and community groups, as well as Radnor House School pupils.</p> <p>In addition, managed access for other local schools can be provided to the Forest School facilities and the ecological corridor. Access to this facility must be managed in a way that ensures that the pupils are safeguarded and their own needs met.</p> <p>Furthermore, to retain the site’s historical legacy, Dukes Education will continue to use the existing outside bandstand. This provides an opportunity for music-based events and concerts to continue to be held at the site, including events that the public can be invited to.</p> <p>Therefore, whilst our client is open to providing managed access to certain parts of the site, it is not feasible or appropriate for open access to be provided. The proposals for the site will result in it becoming more accessible to local community groups and schools, than the site currently is. However, to provide designated publicly accessible green and open spaces is not deliverable, effective or justified.</p> <p>Change Needed and Why: The following requirement should be removed: <i>“the provision of high quality public open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green and open space, available to both existing and new communities.”</i></p> <p>There is not currently public access to the site and it is not feasible to introduce this, as it would conflict with the proposed educational use and pupil safeguarding. Is not deliverable, effective or justified to include a requirement for public open access and public links in the Local Plan.</p> <p>Instead, management access to parts of the site can be provided. This will ensure that the site better serves local community groups and schools than it currently does, whilst ensuring that pupil safety is not compromised.</p> <p>-----</p> <p>Context:</p> <p>-----</p> <p>Draft Site Allocation 20: Kneller Hall, was the ‘home of military music’, occupied by the Royal Military School of Music, for over 150 years.</p> <p>Representations: Agreed</p> <p>Change Needed and Why: None.</p> <p>-----</p> <p>Draft Site Allocation 20: Defence Minister Mark Lancaster announced the release of Kneller Hall on 18 January 2016. The site was eventually sold to Dukes Education who run Radnor House, an Independent School based in Twickenham.</p> <p>Representations: Agreed</p> <p>Change Needed and Why: None.</p> <p>-----</p> <p>Draft Site Allocation 20: Adopted in 2020, the Supplementary Planning Document for Kneller Hall sets out the masterplan for the site.</p> <p>Representations: Agreed, however it is noted that a Supplementary Planning Document (SPD) is not part of the development plan. Whilst public consultation was undertaken as part of the SPD’s preparation, it was not subject to an independent examination and therefore does not hold the same weight in planning decisions as a Local Plan.</p> <p>This SPD was also prepared prior to our client’s acquisition of the site and when it was not known who would acquire the site, when it was taken to the market and disposed of by the MOD.</p> <p>Change Needed and Why: It should be acknowledged in the site allocation that the SPD was prepared prior to the acquisition of the site by our client; at a point when the proposed future use of the site was not known; and also at a point when work to ascertain the cost of repairing and restoring the listed building was not known.</p> <p>The allocation should also acknowledge that the masterplan for the site included in the SPD, provides one potential option for the site, but as a result of the current landowner’s intentions and the constraints of the site, the masterplan needs to evolve from the version included in the SPD.</p> <p>-----</p> <p>Draft Site Allocation 20: There is potential for a new residential “quarter” to be created towards the west of the site as set out in the SPD. Any residential development will need to respect the existing listed Kneller Hall, the site’s setting within the historic core of Whitton and ensure that any proposal integrates well within the existing surrounding area and existing Whitton community.</p> <p>Representations: At the initial master planning stage our client explored the potential of delivering residential development on the far western part of the site. However, as a result of the site’s constraints there are limited opportunities for new build development on the site. The constraints include:</p> <ul style="list-style-type: none">- MOL designation covering the eastern part of the site.- Listed status of Kneller Hall, the boundary wall and the curtilage listed buildings and the requirement to retain these buildings and ensure that new build development is appropriate in their setting.- Extensive tree cover across large parts of the site.- Ecology and wildlife corridor along the site’s northern boundary.- Location proximate to a residential area. <p>When taking into consideration all the site constraints, it is considered that the entire site is required to meet the school’s educational requirements.</p> <p>The far western part of the site is considered to be the only feasible location for the indoor sports facilities, outside of the MOL designation. It is therefore not possible for both residential development and an indoor sports facility to be provided.</p> <p>Change Needed and Why: If any references to residential development are included within the allocation, it should be made clear that this is one possible land use and that there is not a specific requirement for residential development. For the reasons explained in the Representations column, as a result of the site’s constraints, there is not capacity to deliver residential development alongside the education proposals.</p> <p>In addition, the text should be amended from “Any residential development will need to respect...” to “Any new build development will need to respect...”</p> <p>This revised wording better reflects the proposed educational use at the site and ensures that all new build development is required to respect the existing listed Kneller Hall.</p> <p>-----</p> <p>Draft Site Allocation 20: The design of the residential area should seek to create active frontages along Whitton Dene and Kneller Road. The layout of the residential element should be designed to encourage walking and cycling and create a visual and physical link into the existing community.</p> <p>Representations: The western boundary of the site, along Whitton Dene, and the majority of the southern boundary, along Kneller Road, is demarcated by a Grade II listed wall.</p>
--	--	---



	<p>This listed wall is protected and it is intended to be retained as part of our client’s masterplan. Draft Local Plan policy 29 (Designated heritage assets) resist the demolition of listed building and structures. This listed wall therefore limits the opportunity to create active frontages along Whitton Dene and Kneller Road.</p> <p>The school will promote the arrival of students and staff at the site on foot, cycling and via public transport.</p> <p>It is proposed that a currently closed off access on Whitton Dene will be opened up to provide vehicular and pedestrian access to the site. Access via this gate will be managed and this gate will be used for deliveries/ servicing and also to access the indoor sports facilities. Unmanaged access to the site cannot be provided, as this would result in safeguarding issues for the school. The safety and security of pupils must be prioritised.</p> <p>For the reasons explained above, as a result of the site constraints, it is not considered that there is capacity at the site to deliver residential accommodation, in addition to all the required facilities to support the school use.</p> <p>Change Needed and Why: The requirement for active frontages along Whitton Dene and Kneller Road should be removed, as this conflicts with draft policy 29’s requirement for listed buildings and structures to be retained. This requirement is therefore not deliverable.</p> <p>The requirement for a visual and physical link into the existing community, should also be removed as this is not feasible or deliverable due to the need for pupil safeguarding to be prioritised.</p> <p>-----</p> <p>Draft Site Allocation 20: There is opportunity, as set out in the SPD and the Urban Design Study 2021, for the centre of the residential area to have building heights of 4-5 storeys tapered down to 2-3 storeys on the boundaries, with any proposal in the part identified as a mid-rise building zone to be assessed against Policy 45 Tall and Mid-Rise Building Zones.</p> <p>Representations: Page 251 of the Urban Design Study 2021 states that:</p> <p><i>“Kneller Hall: Mid-rise building zone</i></p> <p><i>Existing prevailing height: 3 storeys</i></p> <p><i>Appropriate height: 5 storeys (15m)</i></p> <p><i>A Kneller Hall Masterplan Supplementary Planning Document (SPD) has been prepared to guide future development. The zone occupies a small central area in the site, identified in the SPD as having opportunity for building heights of 4-5 storeys, tapered down to 2-3 storeys on the boundaries. Any proposed buildings should respect the existing grade II listed building (Kneller Hall), ensuring they are sensitive to the significance of the historic building and respond positively to its setting, as well as other site constraints.”</i></p>  <p>It is expected that our client’s aspirations for the site can be delivered within the height development parameters set out within the Urban Design Guide.</p> <p>Change Needed and Why: None.</p> <p>-----</p> <p>Draft Site Allocation 20: The Council will seek a policy compliant level of affordable housing, in line with public sector land disposal.</p> <p>Representations: The site does not have capacity to deliver residential development, and this does not form part of our client’s proposals for the site. The requirement to deliver affordable housing will therefore not be triggered.</p> <p>Change Needed and Why: This text should be amended to stated that <i>“If residential development is delivered, the Council will seek a policy compliant level of affordable housing...”</i>.</p> <p>-----</p> <p>Draft Site Allocation 20: It is expected that the new site owners will provide educational uses but the Council would also support employment generating uses including lower cost units for small businesses, the voluntary sector, creative industries and scientific and technical businesses including green technology.</p> <p>Representations: It is correct that the new site owner will provide educational uses. It is proposed that the site is used as a day school for secondary school aged and sixth form students. A day school use provides a wide range of employment opportunities including teaching staff, administration staff, catering groundsmen, gardening, and maintenance. It is expected that when the school reaches capacity it will provide employment for circa 150 people.</p> <p>There is not capacity at the site, as a result of the site constraints explained earlier in this letter, to deliver any further uses beyond the education uses and associated sports facilities proposed by our client.</p> <p>Change Needed and Why: None.</p> <p>-----</p> <p>Draft Site Allocation 20: Social infrastructure and community uses, such as leisure, sport and health uses, should be incorporated and the need for such facilities should be fully explored.</p> <p>Representations: Our client intends to provide high quality and modern outdoor sports facilities, including an all- weather Astro Turf pitch; indoor sports facilities including a swimming pool and to provide a Forest School for outside learning.</p> <p>As part of the pre-application engagement with the Council, our client will be further exploring the local need for sports facilities.</p> <p>Our client can only permit access to facilities on the site, to nonpupils, provided that this does not compromise their pupil’s safety and also the pupil’s own educational need to utilise the facilities.</p> <p>For this reason, access to the site for other local schools and community groups will need to be managed by our client.</p>
--	---

		<p>Change Needed and Why: It is not considered that it will be possible for ‘health uses’ to be delivered at the site and therefore it is suggested that this is removed.</p> <p>It is also considered that the phrase should be reworded, to recognise that these uses will be delivered as part of the wider school use. The following amended wording is suggested: <i>“Opportunities for managed access for local schools and community groups, to the leisure and sport uses, that will be delivered as part of the education use, should be explored.”</i></p> <p>-----</p> <p>Draft Site Allocation 20: It is expected that the existing playing fields will be retained and where possible upgraded, such as with ancillary facilities, including changing provided to support the use of the playing fields, provided that any existing ecological benefits and the openness and character of the Metropolitan Open Land is retained and, where possible enhanced.</p> <p>Representations: The existing playing fields on the far eastern part of the site will be retained. This land will be used to provide sports pitches, including an all weather Astro Turf, and outside play space for pupils. The existing ancillary facilities will be replaced with modern and fit for purpose changing facilities.</p> <p>Our client has appointed an ecologist who is advising them on ecology.</p> <p>Change Needed and Why: None.</p> <p>-----</p> <p>Draft Site Allocation 20: Any redevelopment proposal for the whole site will require the restoration and enhancement of the existing Grade II listed building (Kneller Hall). The reuse of this historic building offers an excellent opportunity to ensure the site incorporates and promotes a cultural and historic legacy of the ‘home of military music’. Any development should be sensitive to the significance of the historic building and respond positively to the setting of the listed building.</p> <p>Representations: Agreed. It is our client’s intention to restore and enhance the existing Grade II listed building. Significant initial and ongoing investment will be required to restore the building and ensure its ongoing maintenance and protection.</p> <p>The proposed retention of the outside bandstand will help promote the cultural and historic legacy of the site as the former ‘home of the military music’.</p> <p>Change Needed and Why: It should be made clear that the site is the ‘former’ home of military music.</p> <p>-----</p> <p>Draft Site Allocation 20: Parts of the site are designated as Metropolitan Open Land and development in this area would not be acceptable. There is an expectation that any redevelopment proposal improves the character and openness of the Metropolitan Open Land.</p> <p>Representations: Of the total 9.7 ha site, approximately 7.2 ha is designated as Metropolitan Open Land (MOL). This equates to 74% of the site.</p> <p>There is existing built development within the MOL. The Kneller Hall SPD at page 29 states that: <i>“There is an opportunity to focus development in the western part of the site enclosed by the boundary wall. In addition, there is an opportunity to consolidate and re-provide the current built footprint within the MOL in a new building, subject to scale, massing and impact on character and openness”. Page 30 also states that: “Under Local Plan Policy LP 13 there is a potential opportunity to reprovide the buildings in a consolidated footprint, which enhances the sense of openness of the MOL and creates more usable space for uses which support the functioning of the Park”.</i></p> <p>The draft allocation does not currently acknowledge the existing built development within the MOL designation or the opportunity to re-provide the existing scattered built footprint within the MOL in a consolidated footprint. This opportunity should be specified in the allocation.</p> <p>Change Needed and Why: The current wording is not considered to be justified or to reflect the current build development on the site. This part of the allocation should be rephrased to instead state that: <i>“There is an opportunity to consolidate and re-provide the current built footprint within the MOL in a new building(s), subject to scale, massing and impact on character and openness”.</i></p> <p>The SPD acknowledged the acceptability of this approach and this should be carried through to the Local Plan. The current scattered built development within the MOL is not of architectural or historic significance and detracts from the character and openness of the MOL. The delivery of a high quality consolidated building(s), sensitively positioned within the MOL, could improve the character and openness of the MOL as opposed to the existing buildings being retained.</p> <p>-----</p> <p>Draft Site Allocation 20: Any scheme will need to ensure that the site establishes a positive relationship with the surrounding area. This should also include increased permeability for pedestrians and cyclists through the site.</p> <p>Representations: The western boundary of the site, along Whitton Dene, and the majority of the southern boundary, along Kneller Road, is demarcated by a Grade II listed wall.</p> <p>This listed wall is protected and it is intended to be retained as part of our client’s masterplan. This wall therefore limits the opportunity to open up the site or to create permeability to the neighbouring roads. Furthermore, the proposed educational use means that pupils safety must be carefully considered to ensure that a safe learning environment is created. It would not be appropriate for members of the public to have open access to the site and access must be managed by the school for safeguarding reasons.</p> <p>The proposed masterplan seeks to locate uses that there may be managed public access to, at the site boundaries and away from the main educational use. For example, the sports pitches will be accessible via the entrance on Kneller Road with access to the existing parking area to the east of the main Kneller Hall building. The indoor sports facilities will be accessed via an entrance on Whitton Dene.</p> <p>Change Needed and Why: The phrase <i>“This should also include increased permeability for pedestrians and cyclists through the site”</i> should be removed.”</p> <p>It is not deliverable to provide this access and nor is there any justification for it, given the position of the Grade II listed wall; the current restricted access; and also because increased pedestrian permeability for the public would conflict with the educational use.</p> <p>-----</p> <p>Draft Site Allocation 20: Any redevelopment of the scheme should provide habitat enhancement through the creation of an east-west habitat corridor.</p> <p>Representations: This forms part of our client’s proposals and specialist advice is being taken from an ecologist to explore habitat enhancement opportunities.</p> <p>Change Needed and Why: None.</p> <p>-----</p> <p>Draft Site Allocation 20: Design objectives and general guidance relating to the local character of the area, which the redevelopment of this site should have regard to, is set out in the Kneller Hall SPD and accompanying Heritage Assets Assessment, Whitton and Heathfield Village Planning Guidance SPD and the Urban Design Study 2021 in the character area profile and design guidance for D1 Whitton and Heathfield Residential.</p> <p>Representations: The design objectives and general guidance in these documents are being utilised to assist with developing the scheme proposals.</p> <p>Change Needed and Why: None.</p> <p>-----</p> <p>Ownership:</p> <p>Draft Site Allocation 20: Private (previously in public sector ownership)</p> <p>Representations: Correct. The freehold interest in the site is held by ‘Radnor House School Limited’ which is part of the Dukes Education Group.</p> <p>Change Needed and Why: None.</p>
--	--	---

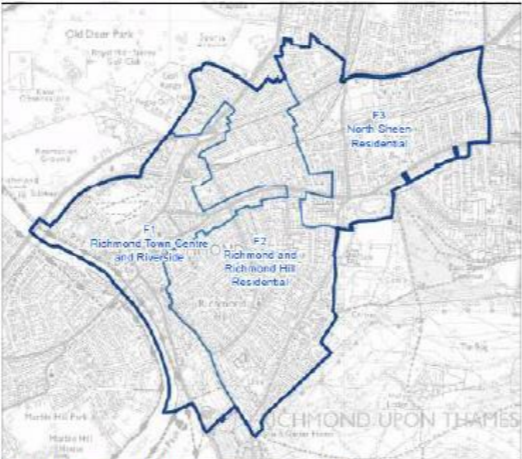
		<p>-----</p> <p>Expected Implementation Timescale: Draft Site Allocation 20: Short- term (0-5 years), Medium (5-10 years), Long (10-15 years) Representations: Our client intends to open the school at the site in September 2023. It is expected that initially the site will only cater for the existing pupils in Years 7 to 11 and sixth form, that will move across from the existing Radnor House School site. Further development will then be built out over the next few years beyond September 2023, to facilitate the further growth of the school to cater for up to 750 pupils. The development works will need to be staggered to ensure that those pupils that relocate to the site in September 2023 learning environment is not impacted by construction works. Noisy building works are therefore expected to be programmed to take place during school holidays. Change Needed and Why: The expected implementation timescale is Short- term (0- 5 years) and Medium term (5-10 years).</p> <p>-----</p> <p><u>Summary</u> Whilst the draft Local Plan acknowledges the recent acquisition of the Kneller Hall site, the current drafting of Site Allocation 20 has not been prepared with any engagement with the site owner, given the relatively short period of time that our client has owned the site for. The ‘Site Proposals’ and ‘Site Context’ set out within Site Allocation 20 need to be amended. The current drafting is not effective, deliverable or justified and parts of the draft allocation conflict with the proposed day school use. The key amendments that need to be addressed are: - Removal of a requirement to deliver employment floorspace, including office floorspace, at the site. - Removal of the requirement to provide public access, increased permeability and active frontages at the site. Any access will need to be managed access. - Recognise that there is an opportunity to consolidate and re-provide the current built footprint within the MOL in a new building(s). - Acknowledge that the Kneller Hall SPD was prepared prior to the acquisition of the site by our client; at a point when the proposed future use of the site was not known; and also at a point when work to ascertain the cost of repairing and restoring the listed building was not known. - Acknowledge the significant financial investment and commitment to the site, and to the protection and restoration of the listed buildings, that will be required to deliver the site. - Acknowledge the constraints of the site and our client’s proposals for the site, which will limit the ability to deliver further uses, beyond the education use and associated sports facilities, that are proposed by the site owner. We would welcome the opportunity to further engage with LBR’s Spatial Planning and Design Team to input into the re-drafting of Site Allocation 20, to ensure that the allocation is effective, deliverable and justified. Our client intends to continue to engage pro-actively and work collaboratively with the Council’s planning department through pre-application discussions, to further progress the proposals for the site and to enable a full planning and listed building consent application to be submitted.. [See Appendix 4 for extract from Masterplan and letter from project cost consultants.]</p>
David Wilson, Thames Water	SA 14 Kneller Hall, Whitton	<p>Thames Water Site ID: 54328 (Reviewed Jan18) Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Additional Comments With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water. As this site is largely greenfield, any development must aim for greenfield runoff rates. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. Due to the recommendations within the proposed Local Plan including enhancement of habitats and the Metropolitan Open Land, we would encourage any development to utilise green SuDS solutions such as tree pits or wet ponds, as well as permeable pavements where possible.</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Site Allocation 20: Kneller Hall, Whitton	<p>We note that site allocation for Kneller Hall (No 20) has been updated with the new owner of the site intending to transform the Grade II listed building into a school. On the western part of the site there remains an opportunity to create a mixed use ‘quarter’ with new homes, employment and community uses. The Context text refers to social infrastructure and community uses, such as leisure, sport and health uses, should be incorporated and the need for such facilities should be fully explored. The CCG responded to the draft Supplementary Planning Document (SPD) for Kneller Hall. The adopted SPD notes that the site falls within the catchments of GP practices at the Whitton Corner Health and Social Care Centre and Maswell Health Centre in Hounslow. The CCGs and Hounslow and Richmond Community Healthcare NHS Trust should be engaged at an early stage of the preplanning of the site to inform the approach to assessing and mitigating any impacts that may arise on the capacity of health services in the locality. We suggest that all options are considered, including the provision of space within the development, or developer contributions to increase capacity of health infrastructure in the area. We note the proximity of the Murray Park community hall and the Whitton Day Centre in Kneller Road and there may be opportunities to provide space to co-locate a range of health and wellbeing and community services.</p>
Laura Hutson, Sport England	Site Allocation 20: Kneller Hall	<p>Sport England is pleased to note that this site allocation specifies that the playing fields should be retained and where possible upgraded. Please also note that it is important to ensure that any other uses do not prejudice the playing fields (for example due to ball strike or noise concerns).</p>
	Site Allocation 21: Whitton Community Centre, Percy Road, Whitton	
Martin Peace, Whitton Community Association	Chapter 9: Place-based strategy for Whitton and Heathfield - Proposed Site Allocation 21.	<p>a. Whitton Community Association is a member-led charity which has operated Whitton Community Centre since its opening in 1974. We welcome the identification of this site as a suitable location for new development as our current building has an outdated layout that does not meet modern needs, is in poor condition and is not energy efficient. The Centre is intensively used by the local community and the case for a community space in the Hospital Bridge Road area remains strong; our location is within reach of a diverse neighbourhood including some of the borough’s most deprived communities.</p>


		<p>b. A new community centre building at such a prominent location should contribute to character and ‘placemaking’ of Whitton and Heathfield through excellent architecture etc, in line with the aspirations in the draft Plan’s Place-based strategy for Whitton and Heathfield.</p> <p>c. More than one storey would be appropriate given the neighbouring buildings.</p> <p>d. We would not wish the site allocation policy to narrow down options for needs-based provision of community spaces across Whitton and Heathfield as a whole, by pre-determining the mix of community centre and residential at the policy site (Site Allocation 21) in particular.</p> <p>e. Any policy should encourage complementary uses to be brought together as appropriate neighbours or co-located within the same building, to support joined up services and sustainable voluntary organisations. It should encourage integrated and flexible community spaces fit for the long term.</p> <p>f. More intensive and coordinated use of sites may free up sites elsewhere for new uses (likely residential).</p> <p>g. There does not appear to be evidence or analysis to show that this would be an especially good residential site, and that appears unlikely given that every adjoining site has an institutional use or the cemetery. Therefore, it is not clear how the policy as currently worded is a useful addition given the Plan’s general policies to both protect community uses and encourage new housing development.</p> <p>h. Unusually for this borough, there is an 80-year-old ‘civic campus’ at Whitton Corner comprising a school, health centre, Homelink (day respite centre) and church alongside the community centre – this should be valued as a coherent non-residential zone with potential for greater integration in the future. We are concerned that its effectiveness could be eroded by isolated new uses (e.g. noise-sensitive residential units).</p> <p>i. The policy should draw the site boundary wider (or at least describe the context of neighbouring sites more specifically). The Local Plan is an important opportunity to create a masterplan for development that works more efficiently and releases other sites. We suggest that the site boundary should include St Augustine’s church’s temporary buildings (at our southern boundary) and the Twickenham School car park and Methodist Church sites along Percy Road.</p>
Jon Rowles	Site Allocation 21: Whitton Community Centre, Percy Road, Whitton	<p>I oppose the idea that you can build residential accommodation above the community centre as there will be incompatible land uses. How will bands, choirs, social groups, or ballroom dances that end at 1 am in the morning take place when there is housing above? The community centre is busy late into the evening, and this allocation threatens its long term future. There are very few other venues in Whitton where music can be played into the night - and this would have a very detrimental impact on the already very limited cultural scene in Whitton. There is a similar community association building in Hampton yet the council does not intend to build housing on top of it – so why is Whitton’s centre being targeted?</p> <p>A better approach will be to keep the whole site in community use, provide for the reprovision of the closed Heathfield Library (if no other site can be found), and extra community space.</p>
	Place-based Strategy for Ham, Petersham & Richmond Park	
Hilary Pereira, River Thames Society	Ham, Petersham and Richmond Park: pages 92-93	<p>There are 10 bridges right across the Thames with at least one footing in Richmond (Kew railway, Kew, Richmond half-tide, Twickenham A316, Twickenham railway, Richmond, Teddington lock, Kingston railway, Kingston, Hampton Court). Some claim this is not enough, and the latest plan reiterates the call for a pedestrian/cyclist bridge between Ham and Twickenham. The outline plans to date for this have not been supported by the RTS, since they appeared to ignore the needs of navigation at high tide, also destroying mature trees and compromising existing public open space and the viability of Hammerton’s ferry. The RTS suggests the time might be right to edit out this un-costed aspiration from local plan (Ham, Petersham and Richmond Park: pages 92-93).</p>
Theresa Oddelm, The Royal Parks	Place-based strategy for Ham, Petersham & Richmond Park	<p>This development area includes Richmond Park, so it is particularly relevant to The Royal Parks. Whilst we welcome the inclusion of Richmond Park within the vision, noting that it will be protected, there is no specific mention of it in the policy. The Park could be specifically mentioned when noting the network of green spaces. Furthermore, we would like to be involved further on in the plan process to ensure that any development around Richmond Park is carried out with due care and consideration for it.</p>
Theresa Oddelm, The Royal Parks	Place-based strategy for Ham, Petersham & Richmond Park– comments specific to biodiversity and the Royal Parks’ Environmental Designations	<p><u>Policy (page 92)</u></p> <p>This should fully recognise the need to protect Richmond Park SAC, SSSI and NNR from all impacts associated with development including increased traffic, recreational pressure and light spill. Effective measures to reduce traffic in the vicinity of, and importantly through, Richmond Park should also be included.</p>
Tim Catchpole, Mortlake with East Sheen Society	Place-based strategy for Ham, Petersham & Richmond Park	<p>Our Society has a particular interest in Richmond Park as a large part of it lies within the boundary of the Parish of Mortlake with East Sheen (see below under strategy 13). Likewise another part of it lies within the Parish of Richmond (strategy 11). We think it illogical for the Park to be associated with Ham & Petersham alone; it should really be considered as a separate area requiring its own place-based strategy.</p> <p>The mention of London’s largest Site of Special Scientific Interest requires explanation. It is the one place in the Borough that merits a Geodiversity label – see our comments below on Policy 39.</p> <p>[See comment on Policy 39]</p> <p>Mention should be made of the Royal Parks’ current strategy for decreasing the number of vehicles within the Park and any initiatives to introduce shuttle buses through the Park with destinations outside the Park.</p>
Andrew Barnard	Plan Based Strategies 10 - Ham, Petersham	<p>Residential developments in Ham & Petersham must take account of the impact of an increased population both in respect of the development phase of new buildings and subsequently when properties are occupied. The local road infrastructure simply does not have the capacity to accommodate significantly more cars or builders lorries notably with the redevelopment of Ham Close. The answer however is not to say simplistically 'walk' or 'cycle' because not everyone can, or indeed wishes to - they prefer to use their cars for whatever reason which they have every right to do.</p>
George Goodby, Environment Agency	Place-based Strategy for Ham, Petersham & Richmond Park	<p>The local authority should include ‘improving the riverside environment’ under the ‘vision’ section.</p> <p>Recommended action: Include ‘improving the riverside environment’ within the vision.</p>
	Site Allocation 22: Ham Close, Ham	
Katy Wiseman, National Trust	Site Allocation 22: Ham Close, Ham	<p>Ham House is located approximately 0.40 miles to the south of proposed Site Allocation 22: Ham Close. The Urban Design Study 2021 identifies Ham Close as being suitable for a mid-rise building zone (5-6 storeys) with any new development to respond appropriately to the surrounding landscape and scale. Residential development between Ham House and the proposed allocation is predominantly low rise at 2 storeys, and we consider that any new development higher than four storeys would have a negative visual impact upon the setting of Ham House. We therefore suggest that the maximum building height should be four storeys at this location to avoid an adverse visual impact upon the setting of Ham House.</p> <p>Changes considered necessary:</p> <p>Residential development between Ham House and the proposed allocation is predominantly low rise at 2 storeys, and we consider that any new development higher than four storeys would have a negative visual impact upon the setting of Ham House. We therefore suggest that the maximum building height should be four storeys at this location to avoid an adverse visual impact upon the setting of Ham House.</p>
Rob Cummins, RHP	Site Allocation 22: Ham Close, Ham	<p>Background to the Representations</p> <p>RHP are currently working with Hill Residential who are the delivery partners for the Ham Close regeneration. A masterplan has been developed by Hill’s architect BPTW in collaboration with the Council.</p> <p>Hill Residential will shortly submit a detailed planning application for the redevelopment of the site. The description of development for the application will be:</p> <p><i>“Demolition of existing buildings on-site and phased mixed-use development comprising 452 residential homes (Class C3) up to six storeys; a Community/Leisure Facility (Class F2) of up to 3 storeys in height, a “Makers Lab” (sui generis) of up to 2 storeys together with basement car parking and site wide landscaping.”</i></p>

		<p>Consultation on the future of Ham Close dates back to 2013. The forthcoming planning application is the culmination of extensive engagement with Ham Close residents; the wider community of Ham and key stakeholders, including the local authority.</p> <p>The redevelopment of Ham Close will be transformative for RHP residents. The current buildings do not meet modern standards. Homes are cramped, falling below minimum space standards and there are issues of damp affecting the living conditions of tenants. Whilst RHP continue to undertake refurbishment works, all agree that a holistic redevelopment of Ham Close is needed. A comprehensive redevelopment will allow a number of wider improvements to the site. This will include (but is not limited to), a modern community centre, a bespoke makers lab and additional housing, including affordable housing. There will also be a number of public realm improvements, a net increase in biodiversity, the inclusion of renewable energy technologies and a number of positive climate-change measures.</p> <p>These representations seek to support the Council in bringing forward development at Ham Close.</p> <p>Site Allocation 22: Ham Close</p> <p>The site allocation includes an associated redline plan. The plan should be amended to include a western strip of land, and hard standing on the eastern edge to the rear of the shopping parade on Ashburnham Road to reflect the community led masterplan. The western strip of land is needed for the regeneration to take place and for the allocation to be delivered. For the avoidance of all possible doubt, the western edge has secretary of state approval for disposal to enable the Ham Close regeneration. Sport England have also been consulted on the proposals, and have provided the following comment (Pre-App Reference 21/P0449/PREAPP (23 December 2021)):</p> <p><i>“...the strip of land in question is not capable of forming part of a playing field. Having checked historical aerial photography, this strip has never been used as a playing field. It is an irregularly shaped piece of land that appears to be planted over, and is also close to trees. It is not advisable to use land too close to trees as playing field as leaf drop can present health and safety issues. Therefore Sport England would be unlikely to object to this element.”</i></p> <p>Meanwhile, the area of hardstanding to the rear of the existing shops is required to deliver the community centre. It should also be noted that the current medical centre does not form part of the masterplan, and there are no current plans to redevelop Ham Clinic.</p> <p>With the inclusion of the western and eastern elements and removal of the clinic land the site area is 4.66 hectares. Below is a diagrammatic representation of the allocation.</p> <div></div> <p>Figure 1: Current Allocation Plan (P94) Regulation 18 Draft Figure 2: Recommended placement Allocation Plan</p> <p>The changes to the area are necessary for the development to proceed and deliver the aspirations for the site. Furthermore, as the proposed planning application is likely to be determined in advance of the emerging local plan being adopted, RHP ask that the plan is substituted to reconcile the areas to avoid being out of date at the point of adoption.</p> <p>Site Proposal</p> <p>The site proposal for the land states</p> <p><i>“The Council supports the regeneration of Ham Close and will work in cooperation with Richmond Housing Partnership in order to rejuvenate Ham Close and its surrounding area. A comprehensive redevelopment of this site, including demolition of the existing buildings and new build reprovision of all the residential and non-residential buildings, plus the provision of additional new residential accommodation with affordable housing at policy compliant levels, will be supported”</i></p> <p>The site proposal is supported.</p> <p>Site Allocation “Context”</p> <p>The context section of the allocation accords with the principles of the masterplan and is therefore also supported. The characterisation of Ham Close as a mid-rise building zone, is consistent with the evidence base (Richmond Urban Design Study 2021), and reflects the community feedback received to the masterplan proposals.</p> <p>Expected Implementation Timescale</p> <p>The allocation anticipates development to come forward in the short term (0-5 years) and medium term (5- 10 years).</p> <p>Upon any grant of planning permission, RHP and Hill Residential will seek to immediately bring forward development. Owing to the nature of the project, the development will be phased to reduce disruption to residents and avoid extensive decanting. RHP support the timescales reflecting these regeneration principles by including the site in both short- and medium-term periods.</p> <p>Conclusion</p> <p>RHP support the Council in allocating Ham Close for redevelopment. A site specific designation is appropriate for such a significant development for the Borough. However, as currently drawn, the allocation excludes land that the development of Ham Close is predicated upon.</p> <p>The representations therefore seek an allocation that includes land to deliver the replacement community centre and the western strip of land on which a new makers lab will be situated together with replacement housing.</p> <p>As one of the Council’s partner affordable housing providers RHP support policy changes which will deliver more affordable homes which will benefit local residents.</p>
Mark Connell, Sphere25 on behalf of Hill Residential	Place Based Strategy for Ham, Petersham & Richmond Park	Within the Vision for the Ham, Petersham & Richmond Park Area, reference is made to the redevelopment of Ham Close being a “key opportunity”. The Policy for the area also cross references the site allocation stating:

		<p><i>“At Ham Close (Site Allocation 22, Neighbourhood Plan Policy O3), the regeneration proposed is an opportunity for redevelopment to create a landmark scheme, creating a sense of identity, providing modern homes and community facilities in the identified mid-rise zone in accordance with Policy45 Tall and Mid-Rise Building Zones.”</i></p> <p>The clear policy direction and recognition that Ham Close can be a landmark scheme is both welcomed and supported by Hill residential.</p>
Mark Connell, Sphere25 on behalf of Hill Residential	Site Allocation 22: Ham Close, Ham	<p>Background to the Representations</p> <p>Hill Residential are the delivery partners for the Ham Close regeneration. A masterplan has been developed in collaboration with Richmond Housing Partnership (RHP) and the Council. Hill Residential will shortly submit a detailed planning application for the redevelopment of the site. The description of development for the application will be:</p> <p><i>“Demolition of existing buildings on-site and phased mixed-use development comprising 452 residential homes (Class C3) up to six storeys; a Community/Leisure Facility (Class F2) of up to 3 storeys in height, a “Makers Lab” (sui generis) of up to 2 storeys together with basement car parking and site wide landscaping.”</i></p> <p>Consultation on the future of Ham Close dates back to 2013. The forthcoming planning application is the culmination of extensive engagement with Ham Close residents; the wider community of Ham and key stakeholders, including the local authority.</p> <p>The redevelopment of Ham Close will be transformative for RHP residents. The current buildings do not meet modern standards. Homes are cramped, falling below minimum space standards and there are issues of damp affecting the living conditions of tenants. Whilst RHP continue to undertake refurbishment works, all agree that a holistic redevelopment of Ham Close is needed. A comprehensive redevelopment will allow a number of wider improvements to the site. This will include (but is not limited to), a modern community centre, a bespoke makers lab and additional housing, including affordable housing. There will also be a number of public realm improvements, a net increase in biodiversity, the inclusion of renewable energy technologies and a number of positive climate-change measures.</p> <p>These representations seek to support the Council in bringing forward development at Ham Close.</p> <p>Site Allocation 22: Ham Close</p> <p>The site allocation includes an associated redline plan. The plan should be amended to include a western strip of land, and hard standing on the eastern edge to the rear of the shopping parade on Ashburnham Road to reflect the community led masterplan. The western strip of land is needed for the regeneration to take place and for the allocation to be delivered. For the avoidance of all possible doubt, the western edge has secretary of state approval for disposal to enable the Ham Close regeneration. Sport England have also been consulted on the proposals, and have provided the following comment (Pre-App Reference 21/P0449/PREAPP (23 December 2021)):</p> <p><i>“...the strip of land in question is not capable of forming part of a playing field. Having checked historical aerial photography, this strip has never been used as a playing field. It is an irregularly shaped piece of land that appears to be planted over, and is also close to trees. It is not advisable to use land too close to trees as playing field as leaf drop can present health and safety issues. Therefore Sport England would be unlikely to object to this element.”</i></p> <p>Meanwhile, the area of hardstanding to the rear of the existing shops is required to deliver the community centre. It should also be noted that the current medical centre does not form part of the masterplan, and there are no current plans to redevelop Ham Clinic. With the inclusion of the western and eastern elements and removal of the clinic land the site area is 4.66 hectares. Below is a diagrammatic representation of the allocation.</p> <div></div> <p>Figure 1: Current Allocation Plan (P94) Regulation 18 Draft Figure 2: Recommended placement Allocation Plan</p> <p>The changes to the area are necessary for the development to proceed and deliver the aspirations for the site. Furthermore, as the proposed planning application is likely to be determined in advance of the emerging local plan being adopted, Hill Residential ask that the plan is substituted to reconcile the areas to avoid being out of date at the point of adoption.</p> <p><u>Site Proposal</u></p> <p>The site proposal for the land states</p> <p><i>“The Council supports the regeneration of Ham Close and will work in cooperation with Richmond Housing Partnership in order to rejuvenate Ham Close and its surrounding area. A comprehensive redevelopment of this site, including demolition of the existing buildings and new build reprovision of all the residential and non-residential buildings, plus the provision of additional new residential accommodation with affordable housing at policy compliant levels, will be supported”</i></p> <p>The site proposal is supported.</p> <p>It is considered that the text may benefit from the inclusion of “Hill Residential” alongside Richmond Housing Partnership. As partners and as the applicant, this will assist readers in connecting the application with the regeneration.</p> <p><u>Site Allocation “Context”</u></p> <p>The context section of the allocation accords with the principles of the masterplan and is therefore also supported. The characterisation of Ham Close as a mid-rise building zone, is consistent with the evidence base (Richmond Urban Design Study 2021), and reflects the community feedback received to the masterplan proposals.</p> <p><u>Expected Implementation Timescale</u></p> <p>The allocation anticipates development to come forward in the short term (0-5 years) and medium term (5-10 years).</p>

		<p>Upon any grant of planning permission, Hill Residential will seek to immediately bring forward development. Owing to the nature of the project, the development will be phased to reduce disruption to residents and avoid extensive decanting. Hill Residential support the timescales reflecting these regeneration principles by including the site in both short- and medium-term periods.</p> <p>Conclusion Hill Residential support the Council in allocating Ham Close for redevelopment. A site specific designation is appropriate for such a significant development for the Borough. However, as currently drawn, the allocation excludes land that the development of Ham Close is predicated upon. The representations therefore seek an allocation that includes land to deliver the replacement community centre and the western strip of land on which a new makers lab will be situated together with replacement housing.</p>
Rob Cummins, RHP	10 - Placed based strategy for Ham, Petersham and Richmond Park	<p>Within the Vision for the Ham, Petersham & Richmond Park Area, reference is made to the redevelopment of Ham Close being a “key opportunity”. The Policy for the area also cross-references the site allocation stating: “At Ham Close (Site Allocation 22, Neighbourhood Plan Policy O3), the regeneration proposed is an opportunity for redevelopment to create a landmark scheme, creating a sense of identity, providing modern homes and community facilities in the identified mid-rise zone in accordance with Policy45 Tall and Mid-Rise Building Zones.” The clear policy direction and recognition that Ham Close can be a landmark scheme is both welcomed and supported by RHP.</p>
David Wilson, Thames Water	Ham Close, Richmond, London TW10 7PL existing sewer diversion	<p>Thames Water Site ID: 49789 existing sewer diversion (PENDING) Water Response The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development. Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Additional Comments Management of surface water from new developments should follow London Plan Policy SI 13 Sustainable drainage, subsection B (the drainage hierarchy) and reduce to greenfield runoff rates. Where this is not possible, evidence should be supplied. As the development is located on a Brownfield site there may be existing sewers or rising mains crossing the site. Where these sewers or rising mains are to become redundant or have to be diverted the full cost of administering and undertaking the works shall be financed by the developer. Where existing sewers or rising mains cross a site and there is no practical way of their being diverted the stand off distances tabulated in the SFA 6th will be applied to assess the width of easement required.</p>
Siriol Davies, Ham and Petersham Neighbourhood Forum	Ham Close p.94	<p>The Urban Design Study identifies Ham Close as a mid-rise building zone (5-6 storeys) whilst the Neighbourhood Plan policy H2 states ‘ Developments over 4 storeys will be considered acceptable if the proposal demonstrates positive benefits in terms of the townscape and local aesthetic quality and relate well to the local context’. Any development at Ham Close will need to address the Neighbourhood Plan policy in this respect.</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Site Allocation 22: Ham Close, Ham	<p>We note that the area includes Ham Close (Site Allocation 22, Neighbourhood Plan Policy O3), where the Council has been working with Richmond Housing Partnership to regenerate the site to provide new homes and community facilities. The CCG and Hounslow and Richmond Community Healthcare NHS Trust have been fully engaged in the emerging proposals for Ham Close. In November 2021, the CCG responded to the EIA Scoping Opinion Request for the development of the site. The site location plan in this report for the site excluded Ham Clinic. Hounslow and Richmond Community Healthcare NHS Trust will continue to provide services from the current clinic site. We suggest that the site allocation boundary is amended to reflect the current proposals for the site. The CCG will continue to engage in a future planning application for the site but have stated that whilst there is no requirement for primary care services to be relocated within the Ham Close redevelopment, the impact of the additional demand on the Lock Road Surgery may necessitate the need for a developer contribution.</p>
	Site Allocation 23: Cassel Hospital, Ham Common, Ham	
Heather Mathew, Richmond Council for Voluntary Service (CVS)	Area Profile 10 Ham Petersham and Richmond Park: Identified Potential site for development 23 The Cassel Hospital	<p>Area Profile 10 Ham Petersham and Richmond Park: Identified Potential site for development 23 The Cassel Hospital: Given the long-term contribution that the hospital has made to the care and therapeutic healing of people with mental illness and their families it would be appropriate to retain an element of the site as a mental health and well-being hub e.g community-based services, a partnership between health and the VCS- place based health hub.</p>
Siriol Davies, Ham and Petersham Neighbourhood Forum	Cassel Hospital p.96	<p>The draft Local Plan accepts that private development may be a way to conserve the heritage. However it should discourage proposals which would lose the potential of opening spaces and gardens to the public. Reference should also be made of the visual contribution the buildings makes to the setting of Ham Common by maintaining and enhancing views of the frontage. Disappointingly the development at the former Convent, which includes new solid gates together with the existing high walls, which make very little visual contribution to the setting of Ham Common.</p>
Victoria Barrett-Mudhoo, Lichfields on behalf of the West London NHS Trust	Site Allocation 23: Cassel Hospital, Ham Common, Ham	<p>West London NHS Trust strongly supports the continued site allocation of Cassel Hospital and recognition that conversion or redevelopment for residential uses could be acceptable if it allows for the protection and restoration of listed buildings. It is noted that the expected timescales for implementation are indicated as in 5-10 years. The Cassel Specialist Personality Disorder Service (CSPD) is a national service and the site is currently still in active use with staff and patients at the site. The Trust is sensitive to this position and recognise the uncertainty around if/when the site may become surplus to requirements. In this regard, the medium timeframe identified seems appropriate at this time.</p>
	Place-based Strategy for Richmond & Richmond Hill	
Theresa Oddelm, The Royal Parks	Place-based Strategy for Richmond & Richmond Hill – comments specific to biodiversity and the Royal Parks’ Environmental Designations	<p><u>Area Profile (page 98)</u> This should include recognition of the nature conservation designations of Richmond Park as immediately adjacent to this area. <u>Policy 9 (page 101)</u></p>

		<p>Whilst this policy encourages 'active travel and exercise', it should also identify the need to protect Richmond Park's SAC, SSSI and NNR from impacts associated with recreational pressure, as well as other impacts associated with development, including increased traffic and light spill.</p> <p>It should also include measures to reduce traffic in the vicinity of, and through, Richmond Park.</p>
Louise Fluker, The Richmond Society	p101 - Section 11 Richmond Hill and Richmond Policy	<p>we agree with the general objectives but are less convinced that Whittaker Square is a natural focus for visitors as it's not an obvious destination. We strongly agree that there should be greater provision of public lavatories and would encourage the Council to consider how this could be provided by private enterprise as in France - e.g. advertiser pays for prime advert space, the proceeds being used for public benefit.</p> <p>We agree with improving North Sheen Residential Area especially if there are housing developments on the Homebase Site and possibly on the Sainsbury's site. The changes by TFL do not encourage us that this will be achievable at least as far as public transport is concerned.</p> <p>Whilst we agree that much more could be made of the area around Richmond Station and we accept that there are few obvious areas for expansion we have doubts about siting even a building of up to 8 storeys there. We are not convinced that the area around Richmond Station is suitable for taller buildings as identified in the Plan. Creating such a cluster would change the appearance of Richmond Town Centre.</p>
Jon Rowles	Richmond & Richmond Hill	<p>The strategy fails to acknowledge the main challenge to Richmond town centre has been the loss of its main department store which has prompted a large number of other fashion clothing retailers to leave the town. There needs to be a strategy to rebuild the comparison good offer – otherwise, there will be a large increase in the need to travel as residents are increasingly having to visit other centres further away to buy clothes and household goods. This does not appear to square with the overarching policy of enabling people to live locally.</p>
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)		<p>Prospect of Richmond is a group of local residents that have extensive knowledge and experience of living in or near Richmond Town and the surrounding area. Two of us have been past chairs of the Richmond Society and one a past chair of the Friends of Richmond Green and one of us chairs the Richmond Heathrow Campaign comprising the Richmond Society, Kew Society and the Friends of Richmond Green. While not part of this response we have extensive involvement with the adjacent Old Deer Park. Two are architects.</p> <p>Individually and together, we have been involved with many planning, licensing, traffic, heritage, charity, cultural and other matters. We are dedicated to the preserving and improving the area for the benefit of residents and other stakeholders. Over many years we have engaged extensively with Richmond-upon-Thames Council and are keen to continue doing so.</p> <p>Place Definitions. We refer to Richmond Town as comprising the Conservation Areas for Richmond Town Centre, Richmond Green, Richmond Riverside and Richmond Hill. The use, character and value of the four components of Richmond are very different but it is this diversity, side by side in a relatively small area, that is so valuable. The whole is greater than the sum of the parts. Local Plan Section 11 heading is 'Place-based Strategy for Richmond & Richmond Hill'. The study area is defined as 'Richmond Town Centre and Riverside, and the residential and mixed use areas into Richmond Hill and North Sheen'. These are character areas F1, F2 and F3 in the Urban Design Study 2021'. 'Richmond Town Centre and Riverside' (F1) is described as including Richmond Green. We believe the four components of Richmond Town should be separately identified in line with the boundaries of the Conservation Areas for Central Richmond, Richmond Green, Richmond Riverside and Richmond Hill and that the character areas should match the Conservation Area boundaries.</p> <p>Confusingly, the extant 'Richmond & Richmond Hill Village Plan' (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD. We note parts of the two Riverside Conservation Areas are on the Twickenham side of the river Thames whereas the Local Plan boundary appears to be the centre of the river.</p> <p>We have extracted the Character Area Map from Arup's Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.</p>  <p>Richmond & Richmond Hill. Urban design Study Dec 2021</p>

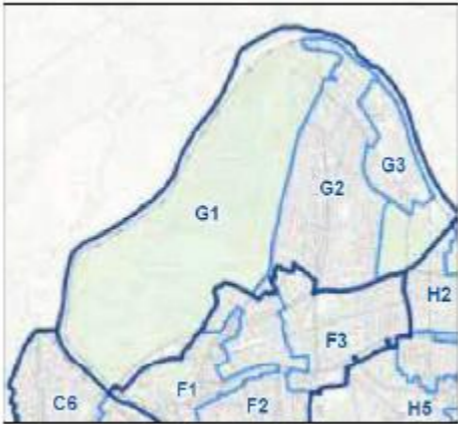

		<div><div><div>Conservation Area 1: Kew Foot Road Character Area 2: The Pagoda Triangle Character Area 3: North of Lower Mortlake Road Character Area 4: South of Lower Mortlake Road Conservation Area 5: Sheensdale Road Character Area 6: Old Gas Works Character Area 7: Between Lower and Upper Richmond Road Character Area 8: Kings Farm Avenue and surrounds Character Area 9: Queen's Road Estate Character Area 10: Queen's Road (west side) Conservation Area 11: St Matthias Conservation Area 12: Richmond Hill Conservation Area 13: Richmond Riverside Conservation Area 14: Richmond Green Conservation Area 15: Central Richmond Conservation Area 16: Sheen Road Character Area 17: Old Deer Park Gardens Conservation Area 18: Old Deer Park</div><div><p>Conservation Areas Richmond & Richmond Hill Village Plan</p></div></div></div>
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Richmond & Richmond Hill	In the un-headed list of contents Section 3 is titled ‘Place-based Strategy for Richmond & Richmond Hill’ whereas it should be titled as ‘Richmond Town Centre and Riverside, Richmond and Richmond Hill Residential and North Sheen Residential’ – assuming that one accepts the highly questionable concept and structure of ‘Character Areas (sic) as set out in Arup’s 432-page Urban Design Study. Needs remedying.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Richmond & Richmond Hill in relation to Richmond BID.	We note the explicit reliance on the RBID and its Vision in the Local Plan Section 11 Place-Based Strategy for Richmond and Richmond Hill but we have not been able to find the Vision Report as evidence and are concerned that since the RBID is established by businesses alone and not residents there is likely to be a bias in favour of businesses. Also, the areas covered by the RBID are parts of Richmond Town Centre and not Richmond Green, for example where we wholly oppose commercial use, other than in the context of mixed use along Greenside. We are concerned that the democratic process may be at risk and while we are not saying this is intentional, we believe the matter needs to be resolved going forward. In so far as our response here is concerned, without the evidence we are not able to make a reasoned response on the RBID Vision included in the draft Local Plan at Placed-based Strategy- Richmond and Richmond Hill.
Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment in relation to Old Deer Park	<p>The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret’s Estate Residents Association. This submission represents the joint response from the Group.</p> <p>The Group was formed in 2012 in recognition of the particular ecological, historical and recreational importance of the Old Deer Park and has since then worked for encouraging and securing the preparation of a coherent strategy for the effective conservation, development and management of the Park. In June, 2012, the Group published its report: The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement. Since then, it has made a number of submissions to the Council on related issues. In this connection and importantly, the Group worked collaboratively with the Council and its consultants on the preparation of the Old Deer Park Supplementary Planning Document (as published in March, 2018). The Group has also worked, and continues to work, collaboratively with the Council on the planning and implementation of projects for the enhancement of the Park, including the recently completed, award-winning scheme for improvements at and adjacent to the Park Lane entrance to the Old Deer Park Car-park. The Group is currently working with the Council to link the Old Deer Park car park with the river Thames along the area between the A316 road and the railway. It is working with the Council on tree planting and with Thames Landscape Strategy in rewilding the ODP section of Thames Arcadia.</p> <p>Richmond Town. We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Prospect of Richmond on Richmond Town to be considered alongside this response from the Old Deer Park Working Group on the Old Deer Park.</p>
George Goodby, Environment Agency	Place-based Strategy for Richmond & Richmond Hill	<p>The local authority should include ‘improving/enhancing the river side environment’ under the ‘vision’ section.</p> <p>Recommended action: Include ‘improving the riverside environment’ within the vision.</p>
Myrna Jelman	General comment in relation to Sheen Road pavements	Finally, I keep asking for this and I keep being told there is no budget but budgets are only decisions and you obviously decide that this is not urgent. The Sheen Road parade of shops may be a neighbourhood centre but it doesn’t have even, safe pavements, even in places where there are very real risks of tripping onto a main road with buses running dangerously close to a very narrow pavement. This is year 6 of this request. I will keep asking! It is unacceptable when all other civic spaces are well taken care of.
	Site Allocation 24: Richmond Station, Richmond	
Richard Carr, Transport for London (TfL)	Site Allocation 24: Richmond Station, Richmond	We welcome the stated aim of a comprehensive approach including transport interchange improvements. We would expect to be closely involved in both the development of the SPD and early discussions about potential redevelopment plans. It would be helpful to make this expectation clear in the site allocation.
Myrna Jelman	Site Allocation 24: Richmond Station, Richmond	PLEASE plan a redevelopment of Richmond Station that includes exits from all platform onto Church Road. This will once again reduce some local car journeys for people living East of the station and provide more inclusive transport for the poorer residents also in that part of Richmond.
Louise Fluker, The Richmond Society	p103-104 Site Allocation Site 24: Richmond Station, Richmond	Presumably the development envisaged will be over the current railway lines with the tall building on the site of the car park? Although the station facade is run down, it is a Building of Townscape Merit and a good example of Art Deco and the architect is believed to be the same as for Surbiton Station which is listed. It certainly merits proper restoration so that it shows that it is the centre of a transport hub. Having a tall building over the top of the facade might not achieve the best aesthetic outcome. We certainly support having an integrated transport hub as a concept but where buses would be based is hard to envisage and relocating taxis would also be an improvement.
Jon Rowles	Site allocation 24: Richmond Station, Richmond	- I do not support an air-rights development over the railway tracks. this will make public transport far less attractive. Those waiting for national rail trains often need to wait for over 25 minutes for trains to destinations such as Whitton and this would mean that the wait would be far less pleasant and will be another 'push' from using public transport.

		Richmond Station has heritage value and I feel this extends to more than just the booking hall but also included the walkways and generous circulation area at platform level where many of the original 1930s features remain such as stair rails, platform buildings, etc. Some restoration could reveal the art deco heritage further. Many people visit Richmond as they want to visit a pretty town on the river that feels less built up and less developed than central London and therefore this proposal could undermine the tourism sector in the town if there is a Hammersmith Station style development plonked on top of the main entrance from which tourists enter the town.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site allocation 24: Richmond Station, Richmond	<p>Both the title and the draft text of this Site Allocation need substantial amendment.</p> <p>The title should refer specifically not only to the Station, but also to the post-War, multi-storey NCP car-park to the south of the Station, the post-War parade of single-storey shops fronting The Quadrant (at nos. 27.B to 27.G) and the post-War office-block fronting Drummond's Place to the south and south-west of the Station, to the post-War parade of shops fronting Kew Road (at nos. 2 to 8 consec.) and the offices above (Westminster House) to the north of the Station, and the surface-level car-park to the north of the Station.</p> <p>A clear distinction needs to be made between proposals directly affecting the Station (together with the tracks and present day-lit, open-air platforms) and those affecting the other buildings and space referred to above. Whilst such proposals need to be coherent, they need to have regard to the substantially different considerations that apply to the present, very fine, locally listed Southern Railway Station complex (and not merely to its front façade to Kew Road and the upper booking-hall), completed in 1937, which is clearly worthy of statutory listing, together with the very fine 19th century platform-canopies serving platforms 4 and 5 and 6 and 7. Given the particular heritage significance of the Station complex - as distinct from the lack of heritage significance of the other buildings and space around the Station (the multi-storey car-park to the south of the Station, the parade of single-storey shops and the office-block fronting The Quadrant and Drummond's Place to the south and south-west of the station, the parade of shops and the offices above fronting Kew Road to the north of the Station, and the surface-level car-park to the north of the Station), there is clearly no scope whatever for the redevelopment of the existing Station complex - or for decking-over the tracks and the present day-lit, open-air platforms.</p> <p>However, this is not to suggest that there is no scope to enhance the existing Station complex - principally by carefully reinstating and restoring its original and very distinctive architectural interest and integrity, which has long remained a desirable objective, involving the removal of a series of damaging alterations carried out over recent years. Importantly, too, any proposed decking-over of the existing platforms and tracks and the resulting loss of daylighting and natural ventilation for the travelling public would not only have a massive and damaging impact on the amenity presently enjoyed by the public using the Station, but would also be wholly inconsistent with current national, London-wide and local sustainability interests. Most importantly, any significant increase in retail, leisure and/or entertainment uses on the site is most likely to harm damage the viability and vitality of the existing and long-established retail, leisure and entertainment in the heart of the Town to the south by drawing people away from The Quadrant, George Street, Sheen Road, The Square, Duke Street, King Street, Red Lion Street, Hill Street and Bridge Street. Similarly, any significant increase in retail, leisure and/or entertainment uses on the site is likely to necessitate a significant level of vehicular servicing that could only be provided via The Quadrant or Kew Road.</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the suggested suitability of the Station site and its immediate setting as 'a tall building zone (7-8 storeys).... with the opportunity for a landmark building' is wholly unacceptable, unrealistic and needs to be omitted altogether.</p> <p>Importantly, there is a clear need to fundamentally review and revise the current Development Brief for the Station site which dates back to March, 2002.</p> <p>Supporting document/evidence: Urban Design Study December 2021 . Character Area F1 Central Richmond Conservation Area</p>
Peter Willan and Paul Velluet, Old Deer Park Working Group		[See comment in respect of Policy 45 and comment in respect of high rise development which refer to Richmond Station]
	Site Allocation 25: Former House of Fraser, 16 Paved Court 20 King Street 4 To 8 And 10 Paved Court And 75 - 81 George Street, Richmond	
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 25. Former House of Fraser, 16, Paved Court, 20, King Street, 4 to 8 and 10, Paved Court and 75-81, George Street, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any development of the site to provide for the enhancement of the external elevations of the existing 1960s building and the complete removal of the existing plant-enclosures at roof level in order to enhance views of the building from The Green and Hill Street, particularly in relation to the setting of the grade II* listed properties in Old Palace Terrace on Richmond Green, and that any extension or extensions to the existing building should rise no higher than the existing building (i.e. above four storeys), or that any replacement development of the site should rise no higher than that of the existing building .</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F1 Central Richmond and Richmond Green Conservation Area Statements</p>
Fiona Holland		I would like to see House of Fraser back again.
	Site Allocation 26: Richmond Telephone Exchange, Spring Terrace, Richmond	
Louise Fluker, The Richmond Society	Site Allocation 26 pp 107-108: Richmond Telephone Exchange, Spring Terrace, Richmond	We support a low rise redevelopment of what is an eye sore.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 26 - Richmond Telephone Exchange, Spring Terrace, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing building should rise no higher than the three-storey part of the existing building, or that any replacement development of the site should rise no higher than that of the three-storey part of the existing building.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F1 Sheen Road Conservation Area Statement</p>
John Buckingham	Richmond Telephone Exchange	Whilst the Richmond Telephone Exchange would benefit from demolition, the obvious replacement would be a single dwelling house to reinstate the single dwelling house at 7 Spring Terrace that was lost in the past. This would be the only way a development could accord with Policy 28 A and B 9 which states “Ensure the design, layout and materials respect and respond to the historic environment and any relevant heritage assets”.
	Site Allocation 27: American University, Queens Road, Richmond	

Louise Fluker, The Richmond Society	Site Allocation 27 pp109 : American University, Queens Road, Richmond	We would support repurposing the site as an educational one or mixed education/ residential or residential
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 27. The American University, Queen's Road, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing buildings on the site should rise no higher than any of the existing buildings on the site, or that any replacement or additional buildings on the site should rise no higher than any of the existing buildings on the site.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F2 Richmond Hill Conservation Area Statement</p>
	Site Allocation 28: Homebase, Manor Road, East Sheen	
Richard Carr, Transport for London (TfL)	Site Allocation 28: Homebase, Manor Road, East Sheen	We welcome the requirement for the retention of the existing bus terminus. It would be helpful to clarify that this comprises both bus standing and drivers’ facilities, and that they should be retained and enhanced in any redevelopment in consultation with TfL. The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.
Marie Lewis	Site Allocation 28: Homebase, Manor Road, East Sheen	<p>I'd like to warmly request a conversation with regards to a specific query on the designation of mid-rise and tall-buildings zones on the 'Homebase site', North Sheen (Site Allocation 28. p. 111 of the proposed/draft Local Plan).</p> <p>I recognise that there is a particular history with regards to plans for this site, and that the draft Local Plan draws upon recommendations from the Urban Design Study 2021, commissioned as part of this review.</p> <p>However, in this instance, it seems that the Urban Design Study has negated to account for the residents and locally designated character cottages on the NW border of the site (these homes directly border the site with only the short width of the London Underground track separating us from the site border), and so the study does not follow the same recommendations of centrally-southerly siting of taller buildings with adequate buffer zones, as it has for other, similar/equivalent sites.</p> <p>Anything above 6 storeys positioned on the border in this way, will swamp these locally designated buildings of character and local merit, and further, have a significantly deleterious impact on daylight of existing residents (leaving some homes below BRE acceptable standards), directly contravening Policies 28, 44, 45 and 46 of the proposed Plan.</p> <p>In short: the tall and mid-rise building zone for the Homebase isn't positioned central-southerly where it would have the least impact on existing residents for all sides... Rather, the proposed Plan places the taller buildings at the NW edge of the site, with no true buffer zone, and so forgets that there are houses directly the other side of the railway, and further, neglects to take in to account the southerly position of the sun in the Northern hemisphere where shadowing is always worse and most detrimental to those northerly of taller developments. - As such, it will cast long shadows over the NW residents for most of the day in winter, all the way across St George's, Bardolph, Victoria Villas, Trinity etc & beyond Raleigh Road.</p> <p>When you look more closely at the ‘heat map’ in the Urban Design Study (p.255, and attached for reference) no true or sufficient buffer has been given to residents on the NW of the site, especially those directly next to the railway/site border on Bardolph Road and the southerly side of St. George’s Road. These residents, along with those on Trinity Road and Trinity Cottages, are those who stand to be most detrimentally affected by taller buildings on the site blocking their light and overshadowing, especially in winter months. Residents on Bardolph Road and the end of Trinity Rd and Trinity Cottages will have their homes left below acceptable BRE standards for light.</p> <p>The report mentions the locally designated buildings of character on the South/Easterly side of the development on Manor Grove and the surrounds, and does provide some lower-rise buffer for these homes, but it completely neglects to recognise the equivalently designated Buildings of Townscape Merit (small Victorian character cottages) on St. George’s Road, Trinity Road, and Trinity Cottages.</p> <p>In summary, anything above 6 storeys will swamp these locally designated buildings of character and local merit, and further have a significantly deleterious impact on daylight of existing residents, directly contravening Policies 28, 44, 45 and 46 of the proposed Plan.</p> <p>I have attached a more in depth summary and also some useful diagrams from the Daylight & Sunlight Report from the Avanton submission [See Appendix 5], to help give some context and gravity of the scale of overshadowing for residents on the NW of the site for buildings above 6 storeys -- effectively we will be in shade of this overbearing development for over half the day in winter months, and some homes will be left well below BRE acceptable standards.</p> <p>I struggled to register my query on the consultation site, so would very much appreciate a formal response to let me know that my observation has been received, and how it will be possible to follow up with me on these material concerns regarding the Plan and designation for the Homebase site.</p> <p>I am unfamiliar with the consultation process for the Local Plan, and would welcome a conversation in the first instance, as I would support sensitive redevelopment of the site and I'm sure a reasonable solution of mid and lower rise could work and provide much needed housing. If however, there are not likely to be further iterations and amendments to the plan for a round of full public consultation**, please let me know if I need to more formally register these concerns as a direct objection.</p> <p><i>**Myself and other residents were not formally notified of this current consultation by letter nor email, so myself and other residents would welcome a fully accessible and truly public invitation to understand and comment/input.</i></p>
Louise Fluker, The Richmond Society	Site Allocation 28 pp 111-112: Homebase, Manor Road, East Sheen:	we support redevelopment but with a limit of 8 storeys as the maximum height
David Wilson, Thames Water	Homebase Ltd. 84 Manor Road, Richmond, TW9 1YB	<p>Thames Water Site ID: 53531 (PENDING - Reviewed 30/12/21)</p> <p>Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments With regard to SURFACE WATER drainage, Thames Water would advise that as the site currently drains via infiltration, we are unable to fully assess the site for a sewer connection prior to completion of infiltration tests. Once infiltration tests are complete Thames Water will be able to assess the capacity requirements of this site, but would expect the site to remain draining via infiltration where possible.</p>

Martin Ellis, South West London Clinical Commissioning Group (CCG)	Richmond and Richmond Hill, Site Allocation 28: Homebase, Manor Road, East Sheen; Site Allocation 29: Sainsbury's, Lower Richmond Road, Richmond	<p>The area includes six site allocations including sites Richmond town centre and out of town retail sites at Homebase (No 28) and Sainsbury's (No 29).</p> <p>We note that the site allocation for Homebase, East Sheen reflects the current planning permission granted by Mayor London at a representation hearing in October 2020. We note that applicant has submitted further revisions to the application, but the CCG has reiterated the need for a developer contribution to provide additional primary care capacity in the local area.</p> <p>The introduction of residential use on the neighbouring Sainsbury's, Lower Richmond Road site will add to the pressure on local healthcare infrastructure. The Context text refers to a 'substantial provision of new housing units'. The CCG would welcome the opportunity to work with the Council to identify future healthcare requirements, which could include new healthcare provision on the site.</p>
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 28 - Homebase, Manor Road, North Sheen	<p>(N.b. Not East Sheen)</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text of this Site Allocation needs to be amended by the deletion of the statement: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones', and the statement '...however the Urban Design Study 2021 recommends the appropriate heights for the zone are up to 8 storeys to respect the small scale of the surrounding area'. The draft text needs to be further amended to include specific reference to the need for any new development across the site to rise no higher than four storeys in order to relate the predominantly two-storey scale of the nearby residential areas to the north, north-west, west, south-west, south and east of the site, and to the similarly scaled properties within the nearby Sheendale Road and Sheen Road Conservation Areas'.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F3</p>
Myrna Jelman	Site Allocation 28: Homebase, Manor Road, East Sheen	I support your decision to have up to 7 storeys for the Homebase redevelopment and have objected every single time to the current and past proposals, notably to the latest ridiculous 11 storeys development. Even the supposedly midnight 8 storey side towers are already one story above the maximum this zone can take.
	Site Allocation 29: Sainsbury's, Lower Richmond Road, Richmond	
Richard Carr, Transport for London (TfL)	Site Allocation 29: Sainsbury's, Lower Richmond Road, Richmond	The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.
Louise Fluker, The Richmond Society	Site Allocation 29 pp 113-114: Sainsbury's, Lower Richmond Road, Richmond	The loss of the supermarket would be a major reduction in amenities in this part of Richmond but we can see the sense in redeveloping the area to make better use of the space and to combine mixed retail/residential provided that the height of the redevelopment is in keeping with its surrounding and in any event not higher than 6 storeys or 8 at most. As with the Homebase site public transport and access would need to significantly improve.
David Wilson, Thames Water	SA 21 Sainsbury's, Lower Richmond Road, Richmond	<p>Thames Water Site ID: 54334 (Reviewed Jan18)</p> <p>Water Response</p> <p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>With regards to Surface Water, we would expect the development to follow the drainage hierarchy as outlined in SI.13 of the London Plan and would require further information before we could comment on discharge to our surface water sewers.</p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures</p>
Jon Rowles	Site Allocation 29: Sainsbury's, Lower Richmond Road, Richmond	- the lack of mention of car parking is conspicuous by its absence. How much car parking does the council believe a replacement supermarket and housing above will require? If the car parking provision is too restrictive the owners are unlikely to bring the site forward for development.
Anna Stott, WSP on behalf of Sainsbury's	Site Allocation 29 - Sainsbury's Superstore, Lower Richmond Road, Richmond	<p>[See comment in relation to general comments and Site Allocation 5]</p> <p>Draft Allocation 29 – Sainsbury's Superstore, Lower Richmond Road, Richmond</p> <p>The draft allocation identifies the Sainsbury's site for comprehensive redevelopment to provide retail and residential uses. The continued use of the site as a foodstore and the re-provision of the existing retail floorspace is required as part of the allocation.</p> <p>SSL support this commitment to re-provide an equivalent amount of retail floorspace as part of any redevelopment scheme.</p> <p>However, whilst it is important for the retail floorspace to be re-provided, the allocation should be amended to also refer to the re-provision of adequate car parking on site as part of the redevelopment.</p> <p>The Sainsbury's store trades very well. with over 85% of transactions still taking place in store. Many shoppers visit the store either on foot or by bicycle. However, visits by car remain enormously important, with the majority of expenditure being on large, weekly shops. Invariably, these will be undertaken by car. It is probable that this pattern will continue going forwards. The store currently provides adequate parking for customers and this is particularly beneficial to those with larger families, the less mobile and vulnerable people for whom public transport, cycling or walking is not an option.</p>

		<p>Table 10.5 of the recently adopted London Plan (2021) states that in outer London the maximum car parking provision for retail uses should be 1 space per 50sqm (GIA). Sainsbury’s are of the firm opinion that any redevelopment envisaged by the emerging Local Plan should incorporate the reprovision of car parking to the London Plan levels to support the viability of any proposed scheme.</p> <p>The site also needs to include enough servicing and operational land to enable future businesses to operate efficiently and without impediment. If the servicing is inadequate, then this will damage the attractiveness of the site for future occupiers and investors.</p> <p>In summary, it is vitally important that the draft allocation is updated to include a requirement to provide adequate car parking provision and servicing areas.</p> <p>Summary</p> <p>In summary, the proposed allocation of the two Sainsbury’s sites (Draft allocations 5 and 29) is unacceptable as drafted. The current wording makes the Plan unsound.</p> <p>Any future version of the emerging Local Plan should include the following:</p> <ul style="list-style-type: none">▪ Allocation 29 – include specific reference to the reprovision of adequate car parking, servicing and operational space on site in accordance with London Plan requirements.▪ Allocation 5 – remove the site from MOL because it is a foodstore car park and PFS, but also remove the reference to 100% affordable housing provision. The affordable housing levels set out in draft policy 11 should apply to the site; and▪ Allocation 5 – remove the reference to 20% BNG. The requirement for BNG should reflect Policy 39, which itself should be amended to require 10% BNG, in accordance with The Environment Act 2021. <p>We hope that these representations will be taken into consideration and that the Council takes this opportunity to engage constructively with Sainsbury’s, as a major investor and employer in the Borough. Unless these suggested amendments are made, the Plan will be unsound.</p>
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 29 - Sainsbury's, Lower Richmond Road and Manor Road, North Sheen	<p>Site Allocation 29 - Sainsbury's, Lower Richmond Road <u>and Manor Road</u>, North Sheen</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text needs to be amended by the deletion of the sentence: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones'.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Charcater Area F3</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Richmond and Richmond Hill, Site Allocation 28: Homebase, Manor Road, East Sheen; Site Allocation 29: Sainsbury's, Lower Richmond Road, Richmond	[See comment in relation to Site Allocation 29]
	Place-based Strategy for Kew	
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Place-based Strategy for Kew	<p>In relation to Section 12 (Place-based Strategy for Kew), under the "other initiatives" sub-heading, the policy recognises that there are active travel opportunities, including upgrades to the Kew Gardens Station footbridge. RBGK request details within the policy of what these upgrades entail. In particular, RBGK note that there are no accessible routes through Kew Gardens Station at present. RBGK would support specific policy wording that would encourage such initiatives.</p> <p>The policy also confirms that future development in this area is expected to "improve wayfinding at the Station and across the town centre to places of interest such as ... the Royal Botanical Gardens." A key objective for RBGK is to ensure that visitors are able to easily navigate from the main stations and ferry terminal to the Gardens. Therefore, RBGK are in full support of this policy to improve wayfinding.</p>
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)		<p>Based on Section 3 – Character Areas in Arup’s 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area ‘G1 – Kew Gardens and Riverside’ under the overall heading ‘G –Kew’). Like Richmond Park, the Old Deer Park should be covered by its own Character Area as ‘F4 – The Old Deer Park’, under the overall heading of ‘F – Richmond & Richmond Hill (sic)’. On this basis, other sections of Arup’s Urban Design Study and to the Draft Local Plan need to be adjusted accordingly.</p> <p>Indeed, more fundamentally, the proposed structure of ‘Character Areas’ relating to Richmond, Kew and North Sheen as set out in Section 3 et seq. in Arup’s Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. They should surely be based for the most part on the present conservation areas.</p>
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Kew (in relation to Old Deer Park)	<p>We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Old Deer Park Working Group on the Old Deer Park to be considered alongside this response from the Prospect of Richmond on Richmond Town.</p>
Peter Willan and Paul Velluet, Old Deer Park Working Group	Place-based Strategy for Kew (in relation to Old Deer Park)	<p>Place Definitions. Based on Section 3 – Character Areas in Arup’s 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area ‘G1 – Kew Gardens and Riverside’ under the overall heading ‘G –Kew’). Like Richmond Park, the Old Deer Park should be covered by its own Character Area as ‘F4 – The Old Deer Park’, under the overall heading of ‘F – Richmond & Richmond Hill (sic)’. On this basis, other sections of Arup’s Urban Design Study and to the Draft Local Plan need to be adjusted accordingly.</p> <p>Indeed, more fundamentally, the proposed structure of ‘Character Areas’ as set out in Section 3 et seq. in Arup's Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. They should surely be based for the most part on the present conservation areas and in this case the Old Deer Park Conservation Area.</p> <p>Confusingly, the extant ‘Richmond & Richmond Hill Village Plan’ (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD.</p> <p>We have extracted the Character Area Map from Arup’s Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.</p>

		<div><p>Kew Character Areas (G1 ODP). Urban design Study Dec 2021</p><div><div><p>Conservation Area 1: Kew Foot Road Character Area 2: The Pagoda Triangle Character Area 3: North of Lower Mortlake Road Character Area 4: South of Lower Mortlake Road Conservation Area 5: Sheppards Road Character Area 6: Old Gas Works Character Area 7: Between Lower and Upper Richmond Road Character Area 8: Kings Farm Avenue and surrounds Character Area 9: Queen's Road Estate Character Area 10: Queen's Road (west side) Conservation Area 11: St Martin's Conservation Area 12: Richmond Hill Conservation Area 13: Richmond Riverside Conservation Area 14: Richmond Green Conservation Area 15: Central Richmond Conservation Area 16: Sheen Road Character Area 17: Old Deer Park Gardens Conservation Area 18: Old Deer Park</p></div><p>Conservation Areas Richmond & Richmond Hill Village Plan</p></div></div>
Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Place Based Strategy for Kew	<p>We support the principle of having a place-based strategy for Kew. We have set out below as tracked changes the amends that we consider necessary to make the strategy sound. We then go on to explain/justify this.</p> <p>Recommended Amendments (tracked changes to Reg.18 draft text)</p> <div><p>There are opportunities in parts of East Kew for <u>new</u> development to positively contribute to improving the character and addressing negative qualities, creating a sense of activity with an inviting public realm as part of a coherent strategy to improve permeability and active travel links. At Kew Retail Park (Site Allocation 30) there is the opportunity for comprehensive residential-led redevelopment to include <u>an element of replacement retail, a range of and small scale complementary commercial</u> uses, improve the public realm, active travel and links to the River Thames <u>(where feasible)</u>. <u>Development in and around Kew Retail Park should be of high architectural quality, informed by a detailed and thorough assessment of the surrounding townscape character, building on the findings of the Urban Design Study (2021) and supported by a comprehensive viewpoint study.</u> There is a tall building zone opportunity <u>(circa 7-8.7</u> storeys), surrounded by a mid-rise buffer to provide for a transition to the more modest surrounding area, in accordance with Policy 45 Tall and Mid-Rise Building Zones. <u>Proposals for buildings of height at Kew Retail Park should be supported by sufficient justification, including a comprehensive Heritage, Townscape, and Visual Assessment.</u> Redevelopment at Kew Biothane (Site Allocation 31) is expected to deliver a residential use with associated open space provision.</p></div> <p>Explanation/Justification</p> <p>The amendments set out above are required in order to ensure consistency with Site Allocation 30, accounting for the recommended amendments set out in the following section.</p>
Peter Eaton	Section 13 - Place-Based Strategy for Mortlake + East Sheen Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake Pgs 131-133	<p>'Village'</p> <p>Wording in the text headed <i>'Site Proposal'</i> has made some proposed changes. The word <i>'village'</i> before <i>'heart'</i> has now been proposed to be removed. This is inconsistent with both the <i>'Vision'</i> wording in the text which seeks to create a new focus to the village by redevelopment of the Stag Brewery site, and with the broader <i>'Village Planning Guidance SPD Dec 2015'</i> - which identifies that the borough is divided into a series of smaller distinctive character areas. Here section 4 - Vision - repeats the goal to <i>'create a new heart to the village by redevelopment of the Stag site.'</i></p> <p>The word 'village' should be retained for consistency and absolute clarity on the <i>Site Allocation</i> wording itself as well as the overarching <i>'Vision'</i> statement.</p> <p>In the section headed <i>'Context'</i> - first bullet point - the reference to the Stag Brewery Planning Brief SPD 2011 has been added. This is a welcome change/addition for clarity and retains the relevance of this document into the future, at least for the life of the new Local Plan - when adopted.</p> <p>On the third bullet point the words <i>'village'</i> - 'and centre' should be retained as per the existing wording.</p>

		<p>There is concern that the proposed removal of the word ‘<i>village</i>’ and the diagrams 27.27 / 27.28 in Appendix 3 could create the opportunity to excessively develop the Stag site with buildings of 5-6-7 floors predominating and covering too great an extent of the site, thus conflicting with the local context and heritage assets.</p> <p>There ought to be greater emphasis in the text on retaining and enhancing the ‘village character’ of the area.</p> <p><i>'School'</i></p> <p>On the fourth bullet point - this mentions <i>'There is a clear need'</i></p> <p>The Council's School Place Planning Strategy may set out the <i>requirement</i> for a new secondary school but the <i>'clear need'</i> for a super-sized 1250 pupil secondary school has been strongly challenged by the community. Also that Strategy does not taken into account the likely damage/harms to the sustainability of the existing local secondary schools if a new large secondary school were to be built on the Stag site, and does not include any impact assessment on the context or local infrastructure.</p> <p>Of concern too is the specific harm which could be caused to the viability of the 6th Forms of the two existing local secondary schools. Any updated Strategy needs to take all these factors into account as well as the major changes and reductions in population identified by the ONS. Despite reported arrivals of families into Richmond and Kingston from Hong Kong, RPA has no HK pupil intake, and Christ's just 8, with spare capacity reported as still available in both schools. The words, <i>'There is a clear need'</i> should be removed until the planning authority is presented with evidence to substantiate this claim.</p> <p>The Stag site school was 'awarded' to the borough as far back as 2015 when previously proposed in Tower Hamlets, who had then decided the school would be surplus to requirements/needs. That previous proposal had been accompanied by a detailed impact report to justify its requirement. No such detailed summary has ever been presented for public scrutiny for the proposed Stag school as far as we are aware.</p>
James Bartholomeusz	Place-based strategy for Kew: Policy (p.118)	I strongly support the aim to promote active travel and reduce the dominance of vehicle traffic. This is after one of our cats was injured in a road traffic accident in September 2021, requiring surgery and months of recovery.
	Site Allocation 30: Kew Retail Park, Bessant Drive, Kew	
James Bartholomeusz	Site Allocation 30: Kew Retail Park (p.119)	The plan states that a "policy compliant" level of affordable housing should be delivered in the redevelopment of Kew Retail Park. This is absolutely necessary - "policy compliance" is the minimum level of affordable housing that we should be aiming for.
Catherine Rostron	12 Place-based Strategy for Kew, Site Allocation: Kew Retail Park	<p>The reason that the Kew Retail Park works so well as a local shopping centre is because it’s retail units are larger than normal local units. This makes it a valuable and unique resource. Removing some of this floor space to build homes would be a mistake. Given the number of homes in the area and the limits to accessing other areas because of the river barrier , this local centre is an essential feature.</p> <p>Talk of higher rise developments is also inappropriate to the area and the quality of the local landscape both from the kew side and from the high quality urban landscape of Strand on the Green. For this reason any future developments need to be limited to the height of the existing Kew Riverside development.</p>
Richard Carr, Transport for London (TfL)	Site Allocation 30: Kew Retail Park, Bessant Drive, Kew	The site is adjacent to the Transport for London Road Network (TLRN). We therefore welcome the statement that <i>‘The applicant is strongly advised to seek pre-application transport and highway safety advice from Borough and TfL Officers before writing their transport assessment.’</i>
Katie Parsons, Historic England	Site Allocations 30: Kew Retail Park, Bessant Drive, Kew and 31: Kew Biothane Plant, Mellis Avenue, Kew	<p>These sites are next to each other and so any cumulative impacts upon the area need to be considered. Ideally this would be referred in the policies. Site 30 is identified as being suitable for tall and mid-rise rise buildings (max 7 storeys). Both sites are bounded to the north by more recent development or 4-5 storeys and so this is likely to be appropriate. Taller elements should be carefully location within the site and the policy could be amended to state this. Generally, however the criteria set out is helpful in managing how the historic environment is treated. We have modelled a height of 21m on Vu City to assess potential impacts upon the Kew WHS, and while theoretically visible, 21m would be below the ridgeline of surrounding development, and so is unlikely to be problematic with regards to Kew.</p> <p>An archaeological Desk Based Assessment will be required for these sites as there is potential for palaeoenvironmental and prehistoric archaeological remains, possibly deeply buried. GLAAS should be consulted at an early stage to advise on place making and public benefit.</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Site Allocation 30: Kew Retail Park, Bessant Drive, Kew	We note that a new site allocation has been added, at Kew Retail Park (Site Allocation 30) where there is the opportunity for comprehensive residential-led redevelopment to include a range of commercial uses. The site adjoins the Levett Square development (the former Inland Revenue site) where the Richmond Medical Group is operating from a new health facility. The CCG would welcome the opportunity to discuss the potential healthcare impact.
Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Site Allocation 30 (Kew Retail Park)	<p>These representations have been prepared by Avison Young (with input from JTP, Montagu Evans, and Energist) jointly on behalf of St George Plc (SG) and Marks and Spencer (M&S), who are the owners of the Kew Retail Park site (referred to as the ‘Landowners’ from hereon).</p> <p>The Landowners welcome the general direction of the Regulation 18 draft Local Plan and strongly support the proposed allocation of the Kew Retail Park site for redevelopment. The principle of redeveloping the site is firmly aligned with the objectives of national and London Plan policy and it represents a fantastic opportunity to bring forward something truly special for the borough. We are keen to work collaboratively with the Council, the local community, and other stakeholders to prepare a planning application for the redevelopment of the site over the course of 2022 and to deliver that scheme as soon as possible.</p> <p>Key to this is ensuring that the new local plan includes an appropriately supportive site-specific policy to act as the basis for the determination of the future planning application, and to ensure that the content of the plan as a whole is sound.</p> <p>The purpose of our representation is to make recommendations on how the site-specific policy could be strengthened and to helpfully identify where we consider there to be soundness issues with the current draft, with regards to the plan being: positively prepared; justified; effective; and consistent with national policy (and in general conformity with the London Plan). In each instance we go on to explain the issue and propose amendments or other solutions to resolve it to ensure that the plan is progressed on a sound basis.</p> <p>We first set out our comments regarding the evidence base (the Urban Design Study (2021) and the Retail and Leisure Needs Study (Part 1) (2021). We then have comments on the Place Based Strategy for Kew, Site Allocation 30 (Kew Retail Park), and Policies 4, 6, 10, 11, 12, 13, 17, 18, 28, 29, 30, 31, 37, 38, and 45 (including Appendix 3).</p> <p>The Landowners welcome an ongoing engagement and dialogue with the Council on Local Plan as it moves forward.</p> <p>Site Allocation 30 (Kew Retail Park) Recommended Amendments (tracked changes to Reg.18 draft text)</p>

		<p><u>Site Proposal</u></p> <p>Comprehensive residential-led redevelopment of the site with <u>the opportunity for an element of replacement retail and a range of small scale complementary mercial uses, including retail, offices (with the provision of affordable workspaces), and leisure.</u> The redevelopment should look to improve the public realm, active transport through the site and links to the River Thames <u>where feasible.</u></p> <p><u>Context:</u></p> <p>Kew Retail Park is a well-used shopping destination made up of seven large floorplate stores and extensive surface car parking.</p> <p>There is a need for housing in the borough and this site is considered to be suitable for a substantial provision of new housing units. The Council expects that a policy compliant level of affordable housing is provided.</p> <p>Due to the site's proximity to the River Thames it is located within Flood Zone 3a (an area at high risk of flooding) and is in a Flood Alert and Warning Area as designated by the Environment Agency. Any redevelopment proposal needs to take this into account.</p> <p>The existing site is car-orientated, and any proposals should look to increase active travel through the site and towards Kew Station and the surrounding area.</p> <p>There is an expectation that any redevelopment provides new on-site Public Open Space <u>in accordance with Policy 37</u> in addition to any external amenity space requirements, delivering multi-functional benefits including for nature conservation and biodiversity value as well as for health and wellbeing of future occupants and users, including surrounding communities.</p> <p>There should be an improvement to the public realm through high quality landscaping, which can enhance and improve the biodiversity of the site. Tree lined avenues are typical of the area.</p> <p>Currently the site has boundary treatments which cut it off from the surrounding area, creating almost an island effect. Proposals should be designed to improve the permeability of the site creating connections with the Kew Riverside and the River Thames <u>where feasible.</u></p> <p>Whilst the site is not located within a main or local centre, it has for many years proved to be a popular retail destination. It is expected that a substantial element of retail development commercial uses will be retained/replaced on site. Opportunities to improve convenience goods retail provision (in order to be suitable to meet 'main food shop' needs) will be supported in order to contribute towards achieving the 20-minute Neighbourhood objectives of Policy 1. The overall mix of uses, which could include other minor/small scale complementary town centre uses, such as retail, cafes, and offices, should be curated so that they add to the vibrancy and vitality of the new community. The proposed office provision should provide affordable workspace for small and medium sized companies.</p> <p><u>While the Sequential and Impact Test requirements of Policy 18 will need to be satisfied at the planning application stage, the requirements to satisfy both tests will be limited in scale and complexity bearing in mind the in-principle acceptability of providing substantial replacement retail floorspace on the site. Proposals that satisfy the Sequential Test and do not have a significant adverse impact on the Borough's town centres will be supported.</u></p> <p>Any new convenience retail provision should not exceed the floor space of the existing units, to protect the existing main centre in Kew.</p>
--	--	---

		<div><p><u>Development should be of high architectural quality, informed by a thorough assessment of the prevailing townscape character of the area (informed by the Urban Design Study (2021). The applicant will be required to demonstrate that the proposed development corresponds/relates with the surrounding character areas, including Kew Residential and nearby Kew Gardens, in line with Policy 28.</u></p><p>The Royal Botanical Gardens World Heritage Site is within 500m which will need to be taken into consideration when designing the scheme.</p><p>The applicant will be required to submit a full transport assessment completed in accordance with local and London-wide guidance. This will include a detailed assessment of its impact on the local and strategic road network. The applicant is strongly advised to seek pre-application transport and highway safety advice from Borough and TfL Officers before writing their transport assessment.</p><p>The Urban Design Study 2021 identifies part of Kew Retail Park <u>as being able to accommodate tall and mid-rise buildings (at least 7-storeys) as a tall building zone (7 storeys) surrounded by a mid-rise buffer zones (5-6 storeys) to provide, providing for</u> an area of transition with the more modest surrounding buildings, in accordance with Policy 45 Tall and Mid-Rise Building Zones.</p><p><u>The applicant will be required to submit a full Heritage, Townscape and Visual Impact Assessment, which will include a detailed assessment of the proposed development's potential impact on surrounding heritage and townscape receptors, in line with Policy 45.</u></p><p>Design objectives and general guidance relating to local character of the area, which any redevelopment proposal should have regard to, is also set out in the Urban Design Study 2021, G3 East Kew Mixed Use and in the Kew Village Planning Guidance.</p></div> <p>Explanation/Justification</p> <p>1. The Principle of the Allocation</p> <p>The principle of allocating the site for comprehensive residential-led redevelopment is firmly encouraged by London Plan Policies SD7, E9, and H1, which require boroughs to realise the full potential of existing out-of-centre retail parks for housing intensification and other uses.</p> <p>2. Site Availability</p> <p>The effectiveness of the allocation is dependant on whether the land will be made available for development over the plan period, as this determines whether the allocation is deliverable. We set out the key considerations below:</p> <p><u>Planning Context</u></p> <p>The site is developed and in active use. It accommodates a series of warehouse buildings extending to 139,204sqft (12,932sqm) in retail use with extensive associated surface car parking (558 spaces). The buildings accommodate the following occupiers (approximate floorspace (GIA) in brackets):</p> <ul style="list-style-type: none">- Sport Direct (15,904sqft)- TK Maxx (14,054sqft)- Gap (10,000sqft)- Next (includes Costa Coffee) (10,034sqft)- Boots (12,000sqft)- M&S (include food, non-food, and café) (77,176sqft) <p>The development was implemented pursuant to outline planning permission ref. 92/1676 which was approved in 1993. Applications for the approval of reserved matters were then subsequently approved. Headline details are as follows:</p> <ul style="list-style-type: none">- The total number of units must be between 3 and 8;- Minimum size of a single unit limited to 500sqm (sales area). Total floorspace (GIA) to not exceed 13,935sqm;- Opening hour restrictions; and- Units shall only be used for the sale of non-food items (except restaurant). <p>Conditions attached to the operating consent have subsequently been varied, including as follows:</p> <ul style="list-style-type: none">- 95/2073. Use of up to 1.5% of the gross floor area (21sqm) of a unit (no details available) for the sale of baby foods. Personal consent for the benefit of Children’s World Ltd. Approved.- 97/2469. S.73 application to allow up to 1.5% of the gross floor area (16.89sqm) of unit D (Boots) to be used for the sale of baby and dietary foods. Approved.- 99/290. S.73 application to allow 743sqm of the M&S Unit to be used for the sale of food. Approved. Personal consent for the benefit of M&S only (controlled by s.106 agreement).- 02/3091. S.73 application to amend opening times of M&S unit. Approved. <p><u>Site Ownership and Conditions for Making the Site Available</u></p> <p>The entirety of the proposed allocation site is under the ownership of SG and M&S:</p> <ul style="list-style-type: none">- M&S own the unit currently occupied by the M&S store;- SG own the other retail units; and- SG and M&S have joint ownership rights over the car park, servicing areas, and access. <p>Refer to land ownership plan at Appendix B.</p> <p>The overlapping ownership rights mean that the ability to bring forward the comprehensive redevelopment of the site is dependent on both landowners being willing to make their land available for development. Their willingness will be dependent on operational and viability based commercial considerations being satisfied, which are different for each landowner. This is in the context that the site is currently in an active, highly valuable use, that is expected to remain viable in the long term. We set out the conditions/requirements for each landowner below:</p> <p><i>St George</i></p> <p>St George acquired its part of the site in 2021. While it provides a viable long term income stream, SG’s objective is to work with M&S to bring forward the comprehensive redevelopment of the whole site to include a substantial amount of new housing at the earliest opportunity. Clearly this will be significantly influenced by the policies in the new Local Plan.</p>
--	--	--

M&S operates two stores within the borough (KRP and Richmond Town Centre) plus food-only stores at Richmond Station (franchise) and Barnes. The KRP and Richmond Town Centre stores complement one another with KRP serving a more regional catchment and the town centre a more local catchment. Both stores trade well. M&S has no intention of closing either store. Both have been identified as priority stores for upgrade/investment as part of M&S’s ‘Renewal’ strategy.

M&S is keen to invest in improving the KRP store as soon as possible. Its options are either to retain and refurbish the existing store or to provide a new replacement store as part of the comprehensive redevelopment of the site (which it would progress with SG). Its willingness to progress the redevelopment option will be dependent on feasibility, which will be subject to the following commercial tests being met:

- The replacement store must include replacement comparison goods floorspace plus a minimum 25,000sqft of convenience goods floorspace (net sales area) plus car parking; and

- The KRP store must continue to trade throughout redevelopment which will require the new replacement store to be completed prior to the demolition of the existing store.

Timescales

Each of the retail units under SG’s ownership are in active use. However the terms of leases allow flexibility in obtaining vacant possession of these units which will be obtained once a planning permission is in place. The existing M&S unit can be vacated following the completion of the replacement store, which in practice will be a key driver in development phasing. It is anticipated that the car park could be vacated and made available for development in phases.

Soundness Issues with Current Draft

As explained above, the principal site availability issue is that the willingness of the landowners to bring the site forward for comprehensive redevelopment is dependent on the ability of M&S to provide a replacement store of a minimum specification. In order for the allocation to be **effective** and **positively prepared**, it is critical that it includes express, positive support for substantial replacement retail development (including an increase in convenience retail floorspace) on the site alongside the substantial residential development that the current draft already supports.

3. Land Uses (Residential)

As explained above, part of the site is owned by SG. SG is part of the Berkeley Group which builds homes and neighbourhoods across London, Birmingham and the South of England. Berkeley specialises in brownfield regeneration, reviving underused land to create unique, sustainable and nature-rich places where communities thrive and people of all ages and backgrounds can enjoy a great quality of life. The group as a whole is one of the largest residential developers in London, Berkeley built 3,254 homes in 2020/21 and a total of 18,481 over the last five years (including joint ventures). 2,825 homes were delivered in London, some 10% of London’s new private and affordable homes

SG acquired its part of the site in 2021 with the intention of working with M&S to deliver comprehensive redevelopment, including substantial new housing. It has the demonstrable intent and capability to deliver the draft policy requirement of substantial residential development which we strongly support. We note that this is firmly aligned with London Plan Policies E9 C(6), SD6, SD7 and H1which encourage the redevelopment of out-of-centre retail parks to deliver housing intensification alongside other uses.

We consider the content of the site allocation as relevant to residential development to be sound. However, we note that there is no need to repeat content that is adequately covered in other policies (such as affordable housing).

4. Land Uses (Retail)

The Principle of Substantial Retail Use

As explained above, the site currently accommodates 12,932sqm of retail floorspace. Accordingly, the acceptability of substantial retail floorspace on the site is already established in planning terms.

The principle of replacing this existing floorspace is supported by London Plan Policy SD7 (A3) (and Policies E9 C(6), SD6, and H1) which encourage the comprehensive redevelopment of out-of-centre sites such as KRP and confirm the acceptability of including replacement retail floorspace of up to the same existing overall quantum. The policies then confirm the acceptability of increasing the amount of retail where this can be justified by sequential and impact policy tests in accordance with the national planning policy approach to control such matters.

We recommend that this point is confirmed in the policy wording (or supporting text) in order to ensure that the policy is demonstrably **justified** and capable of being implemented in an **effective** manner.

The Area-Specific Need for Improved Access to Convenience Retail Provision

As explained above, the availability of the site for redevelopment is dependent on the provision of substantial replacement retail floorspace (a replacement M&S store). This includes a requirement to increase the amount of convenience goods retail floorspace to a minimum 25,000sqft (net sales area).

The Richmond upon Thames Retail and Leisure Needs Study Phase 1 Update (July 2021) identifies an over-supply of convenience goods retail floorspace in the period to 2029, however long-term growth suggests an under supply by 2039. This is a borough level quantitative assessment of capacity which does not take account of more localised quantitative or qualitative needs.

We consider there to be a need to increase the amount of convenience goods retail floorspace in/around Kew in order to deliver the strategic policies that underpin the draft local plan as a whole – notably the Living Locally/20-Minute Neighbourhood principles of Policy 1 which is at the heart of the local plan. Policy 1 states that the ‘living locally’ concept will be achieved by giving people the ability to meet most of their daily needs (including access to food shopping) within a 20-minute walk from home, with safe cycling and public transport options. As demonstrated in Map 4.1 of the Local Plan, most of the borough is within 800 metres (as the crow flies) of a centre or shopping parade including much of Kew. However, on closer investigation it is clear that existing (and future) residents in much of Kew (including the KRP site) do not live within 20 minutes’ walk of a supermarket that is capable of meeting a ‘main’ food shop need.

Details of the closest supermarkets to the KRP site are set out in Table 5.1 below (refer to walk-distance maps at Appendix A):

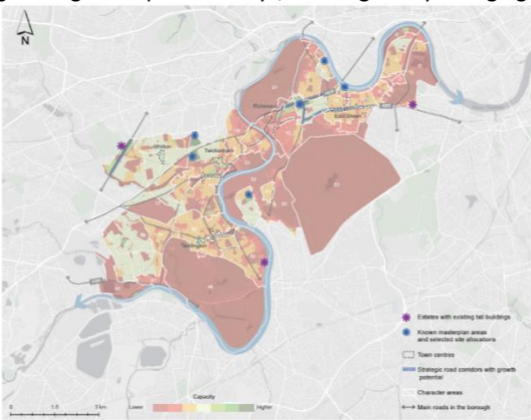
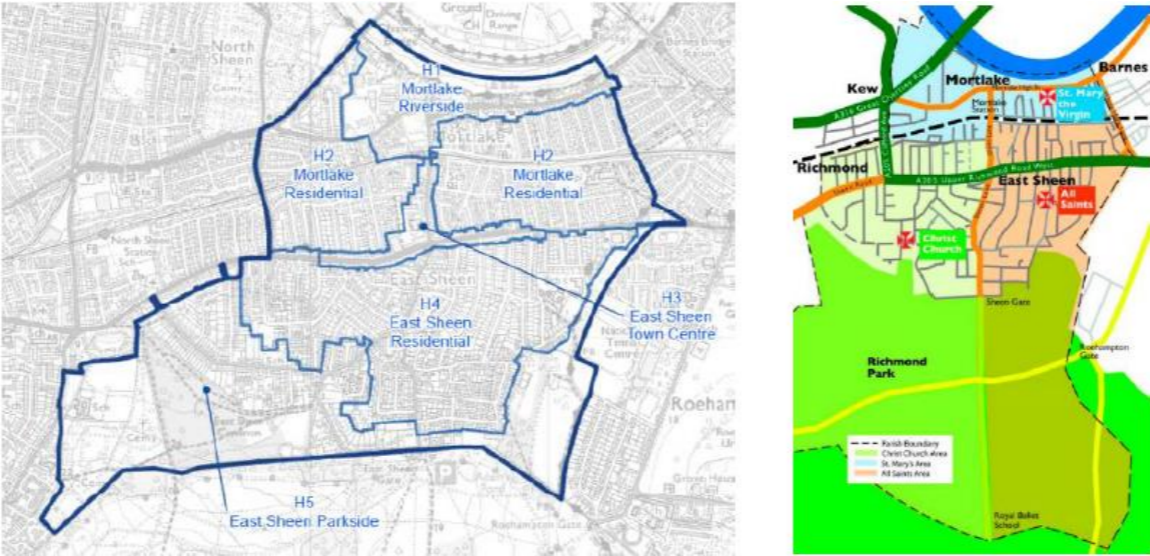
Table 5.1 Existing Local Supermarkets

Store	Address	Suitable for a Main-Food Shop?	Distance from KRP Site	Walk-Time from KRP Site
M&S	Kew Retail Park	No Top-up Only	-	-
Tesco Express	2-8 Station Parade, Kew, TW9 3PZ	No Top-up only	0.5 miles 0.8 km	11 minutes
Sainsbury's	Lower Richmond Road, TW9 4LT	Yes	1.2 miles 2 km	23 minutes
Waitrose	Upper Richmond Road, East Sheen, SW14 7JG	Yes	1.3 miles 2.1 km	28 minutes

		<p>This existing access deficiency (on the basis of the requirements of Policy 1) translates to a qualitative need to improve convenience retail provision in Kew, in order that it is capable of providing for main food shop needs (as opposed to just top-up shopping). This need will intensify with the delivery of substantial new housing on the KRP site (as sought by the draft site allocation). The provision of an improved convenience retail offer as part of the replacement M&S (required to make the site available for development) will satisfy this need, and ensure that the requirements of Policy 1 can be achieved for both existing and future residents in Kew.</p> <p>Accordingly, in order for the Site Allocation to be effective (consistent with the rest of the Plan), positively prepared (meets the area’s needs) and justified (based on evidence) we recommend that it is amended to specifically support the principle of the provision of improved convenience retail goods floorspace on the site as part of the replacement retail development.</p> <p><u>Restrictions on the Type of Retail Provision (Convenience Goods)</u></p> <p>The existing amount of convenience retail floorspace on the site comprises approximately 760sqm (net sales area).</p> <p>As currently drafted the policy states that ‘<i>any new convenience retail provision should not exceed the floor space of the existing units, to protect the existing main centre in Kew</i>’. It is not clear what the exact intended meaning is of this (this should be clarified), nonetheless it could be interpreted as restricting the acceptable amount of convenience retail floorspace to no more than the existing. This approach would not be sound in our view.</p> <p>Firstly, a restriction would not be in general conformity with the London Plan. London Plan Policy SD7 Part A(3) (as also firmly encouraged by London Plan Policy E9 (Part C(6)) and Policy H1) requires boroughs to realise the full potential of existing out-of-centre retail parks. As a starting point, SD7 supports the principle of replacement out-of-centre retail floorspace of up to the same quantum as the overall existing. Aside from the restriction on overall retail floorspace SD7 does not provide any restrictions on the redevelopment, replacement, or re-organisation of existing retail or leisure space – specifically it does not impose any restrictions on what type of goods the retail floorspace can be used for. It then confirms the acceptability of increasing the amount of retail at such sites where this can be justified by sequential and impact policy tests in accordance with the national planning policy approach to control such matters.</p> <p>Secondly, the evidence set out in the Council’s Retail Study Part 1 does not support a restriction on the amount of convenience retail floorspace at the site. A restrictive approach would require a clear and reasonable justification which is not provided in either the Phase 1 retail study and / or the draft Plan itself. In particular, it is briefly suggested that the proposed approach is to protect the health of town centres but no evidence is provided in order to demonstrate that the provision of replacement / net additional convenience goods floorspace at Kew Retail Park will lead to any harm to nearby defined ‘town centres’. Accordingly, a restriction would not be justified.</p> <p>This is in the context that policies should be positively worded.</p> <p>As a final comment, we note that the allocation of Kew Retail Park is not the only site allocation to mention convenience goods floorspace in the draft Local Plan. The other references are in relation to a small number of ‘town centre’ allocations where a cap / limit / restriction has not been imposed.</p> <p>Accordingly, in order to be effective (consistent with the rest of the Plan), positively prepared (meets the area’s needs) and justified (based on evidence) we recommend that the policy is amended to remove any restrictions on the amount of convenience retail goods floorspace on the site as part of the replacement retail provision.</p> <p><u>Sequential Test and Impact Assessment Requirements</u></p> <p>For the reasons set out above, we recommend that the site allocation wording is amended to explicitly support the principle of substantial replacement retail development, including an increase in the amount of convenience goods floorspace in order to ensure the soundness of the policy.</p> <p>We do not consider it necessary for the site allocation to define the acceptable amount of retail floorspace (in order for it to be sound) – rather this should be a matter dealt with at the planning application stage. With this approach it will be necessary to satisfy sequential and impact policy tests at the planning application stage in line with London Plan Policy SD7 and Local Plan Policy 18. Bearing in mind that the principle of substantial retail will have been established in the policy, the extent of the assessment work required to satisfy the policy tests should be proportionate.</p> <p>In order for the policy to be effective (and cognisant of NPPF para 16d) we recommend that the policy (or supporting text) is amended to account for this.</p> <p>5. Land Uses (Offices)</p> <p>The draft allocation requires the provision of offices (including the provision of affordable workspaces for small to medium sized companies).We consider this to be unsound on the basis that it is not justified by evidence nor consistent with national policy. It would also be inconsistent with other parts of the plan and therefore risks not being effective.</p> <p><u>Existing Use</u></p> <p>The site does not currently accommodate any office (or other employment) uses. Accordingly, unlike retail uses (for example) the principle of such uses on the site has not been established, nor would redevelopment pose a risk of existing office/employment uses being lost.</p> <p><u>Evidence Base</u></p> <p>The Employment Land and Premises Needs Assessment (2021) identifies a need for additional office and industrial use accommodation in the borough. It identifies a need for a minimum 40,000sqm of office accommodation over the plan period, however that there is a very limited pipeline supply of sites to meet this need.</p> <p>It recommends that these needs can best be met via the intensification of the borough’s existing employment sites and/or the repurposing of land/buildings within the borough’s town centres (particularly Richmond town centre which is highlighted as a commercially attractive office location).</p> <p>It also recommends that office supply is boosted ‘wherever the opportunity presents itself. Kew Retail Park is referenced at paragraph 5.46 as a potential ‘opportunity’ for potential supply of offices in the context of town centre sites (which we note is not the case – it is an out-of-centre location).</p> <p><u>National Planning Policy/London Plan</u></p> <p>In order to be sound, the recommendations of the aforementioned needs assessment should be applied in a manner that is in accordance with national planning policy and in general conformity with the London Plan.</p> <p>Offices are defined as a Main Town Centre Use for the purposes of Annex 2 of the NPPF. NPPF paragraph 86 requires a range of suitable sites to be allocated in town centres to meet the scale and type development likely to be needed. Where suitable and viable town centre sites are not available for main town centre uses, appropriate edge-of-centre sites should be allocated followed by other accessible locations that are well connected to town centres. Consistent with this is London Plan Policy E1 which directs new office uses in Outer London to town centres and existing business parks.</p> <p><u>Consistency with Other Draft Local Plan Policies</u></p> <p>In order to be effective, there must be consistency between each policy in the new Local Plan in order that it can be read ‘as a whole’.</p> <p>In line with national/London Plan policy, Policies 23 directs ‘major’ new office development to town centres, with smaller scale office development directed to designated Key Business Areas and other ‘suitable locations’. Similarly, Policy 21 directs other major employment development to town centres and designated employment sites, while only allowing ‘other’ (which we interpret as non-major – i.e. less than 1,000sqm floorspace) to be located elsewhere.</p> <p><u>Soundness Issues with Current Draft</u></p> <p>As currently drafted, the site allocation requires offices (including associated affordable workspace) to be provided on the Site. While we recognise that there is an identified need for office accommodation in the borough, the Site is not in a town centre nor in a designated employment area therefore allocating it for ‘major’ office development would not accord with national or London Plan policies nor would it be consistent with other policies in the draft plan. The broader policy basis would support ‘minor’ office uses on the Site which could form part of a range of small-scale complementary uses (see next section), nonetheless we consider that an express ‘requirement’ for offices (as currently drafted) would not be justified, effective, nor consistent with national policy.</p>
--	--	--

		<p>6. Land Uses (Other Non-Residential Uses)</p> <p>In line with the overall approach of the policy as currently drafted, we support the inclusion of a range of small-scale other uses that would add to the vibrancy and vitality of the new community. The requirement as currently drafted is very specific (retail, café’s and offices) which would prevent other perfectly acceptable other uses from coming forwards. In order to ensure the effectiveness of the policy we recommend that a more flexible approach is adopted to other uses as per the recommended amendments.</p> <p>7. Land Uses (Public Open Space)</p> <p>The policy wording regarding the provision of public open space is not entirely consistent with Policy 37. In order for the plan as a whole to be effective, there must be consistency between policies. As per our recommended amendments, we suggest that detail is stripped out of the site allocation and replaced with a ‘sign-post’ to Policy 37.</p> <p>8. Design</p> <p><u>Connections and Permeability</u></p> <p>The site allocation calls for improving the permeability of the site by creating connections through to Kew Riverside and improving links to the River Thames. While we agree that this is desirable and would be a benefit to the scheme and the wider area, there are issues outside of the landowners’ control that prevent direct options specifically along the eastern boundary. The Kew Riverside development is under private land ownership and the roads are not adopted by the local authority. There are also significant level changes along the eastern boundary where the level drops on the Kew Riverside side to allow for basement parking. This further restricts the potential of connecting the two sites.</p> <p>Therefore, creating new connections into Kew Riverside from the KRP site will be extremely challenging. There is potential to connect to the open space along the southern boundary which then allows access to the River Thames. We suggest that the policy is amended to state that new connections/permeability is provided ‘where feasible’ to ensure that it is properly justified and effective.</p> <p><u>Public Space & Landscape</u></p> <p>While ‘tree lined avenues’ may be typical of the area we feel that this is too prescriptive for the site allocation and may limit the landscape response to the site. We recommend that the policy is amended accordingly.</p> <p><u>Building Heights</u></p> <p>We welcome the requirement for development at Kew Retail Park and the wider area of Kew to improve and transform parts of East Kew through by improving the sense of place, public access and legibility. Based on our findings following a review of the Urban Design Study (2021), the Place-based Strategy for Kew is, however, unsound in its current form, as it is not supported by a sufficient evidence base to support specific building heights identified for the KRP site.</p> <p>The prescribed building heights that form part of the policy are not sufficiently backed up by a robust evidence base in the Urban Design Study. We believe that a range of heights across the site would be more suitable. We will produce our own evidence to justify this as part of the preparation of the planning application for the site.</p> <p>Please refer to our comments regarding the Urban Design Study and our representations to Policy 45.</p> <p>[See comment in relation to the Urban Design Study and comment in relation to Policy 45]</p> <p>[See Appendix 6 for Appendix A Walk-time to Supermarkets and Appendix B Site Ownership Plan]</p>
	Site Allocation 31: Kew Biothane Plant, Mellis Avenue, Kew	
Catherine Rostron	12 Place-based Strategy for Kew, Site Allocation: Kew Biothane Site	<p>I agree that this would be suitable for housing but do not believe that developments higher than the height if the existing Kew Riverside development can be justified fir the reasons given above about the visual impact. In addition most people do not want to live in high rise developments.</p> <p>I also feel that social housing would be a particularly good use of the site as this part of the borough has very little of it.</p>
David Wilson, Thames Water	Kew Biothane Plant Melliss Avenue Kew	<p>Thames Water Site ID: Site ID: 49790 (APPROVED - 16/09/20)</p> <p>Water Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>With regards surface water discharge, we would expect this to be discharged directly to the River Thames due to its close proximity.</p> <p>To the north of the proposed development site sits Kew Biothane SPS. There are also easements and wayleaves running through the east and west of the Site. These are Thames Water Assets. The company will seek assurances that it will not be affected by the proposed development.</p> <p>The proposed development is located within 15m of a Thames Water Sewage Pumping Station. Given the nature of the function of the pumping station and the close proximity of the proposed development to the pumping station we consider that habitable rooms should be at least 15m away from the pumping station assets as highlighted as best practice in Sewers for Adoption (7th edition)'. Future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise.</p> <p>The proposed development is located within 15m of a strategic sewer. Thames Water request that the following condition be added to any future planning permission. No piling shall take place until a piling method statement has been submitted to and approved in writing by the local planning authority in consultation with Thames Water.</p>
Katie Parsons, Historic England	Site Allocations 30: Kew Retail Park, Bessant Drive, Kew and 31: Kew Biothane Plant, Mellis Avenue, Kew	<p>[See comment against Site Allocation 30]</p>
George Goodby, Environment Agency	Site Allocation 31: Mellis Avenue, Kew	<p>This site is located within tidal Flood Zone 3 and therefore all sleeping accommodation must be located above the tidal breach 2100 flood level. The site is also located next to the statutory tidal Thames flood defences, as the embankment along the eastern boundary protects the site from tidal flooding, and therefore raisings in line with the TE2100 Plan will be required. This will need to be raised by 0.5 metres before 2065 and another 0.5 metres before 2100. To raise the embankment, the local authority and developer will need to ensure there is sufficient set back between the development and the flood defence to accommodate the raisings and future maintenance. A minimum of 16 metres set back is expected between the toe of the embankment on the landward side (western edge). This 16 metre set back would be in addition to the space needed to raise the embankment to 6.94 m AOD. It should also be noted that the Environment Agency would not accept a raising strategy or design that pushed the flood defence riverward of its current position because of the detrimental impact it would have on flood storage and the environment.</p>

		<p>The site has the potential to consider a Riverside Strategy Approach to raising the flood defences, which would benefit not only flood risk but the public realm and biodiversity too. This supports your aims for open space provision at the site. We recommend you refer back to our Riverside Strategy Approach section and attached guidance note. [See Appendix 7 for attached guidance note]. We recommend you promote this strategy within the site allocation, perhaps within bullet points 5 or 7.</p> <p>Recommended action: Please recommend a Riverside Strategy Approach is taken to achieving the TE2100 Plan flood defence raisings in this location.</p> <p>Bullet point 7 states ‘<i>There is an expectation that any redevelopment provides new on-site Public Open Space in addition to any external amenity space requirements, delivering multi-functional benefits including for nature conservation and biodiversity value as well as for health and wellbeing of future occupants and users, including surrounding communities</i>’. We recommend that benefits for flood risk and flood storage are also mentioned within this list.</p> <p>The wording could be amended as follows: ‘There is an expectation that any redevelopment provides new on-site Public Open Space in addition to any external amenity space requirements, delivering multi-functional benefits including for nature conservation and biodiversity value, flood risk and flood storage, as well as for health and wellbeing for future occupants and users including surrounding communities. We recommend that a Riverside Strategy Approach is taken.’</p> <p>Recommended action: We recommend you update the wording of context bullet point 7 within Site Allocation 31 to include references to flood risk, flood storage and the Riverside Strategy Approach. Please also include that we would not accept the embankment/flood defence line moving towards the river as this would impact flood storage and biodiversity.</p> <p>The buffer zone will help to reduce shading and should be free from all built development including lighting. Domestic gardens and formal landscaping should not be incorporated into the buffer zone. The buffer zone should be planted with locally native species of UK genetic provenance and appropriately managed under an agreed scheme. The buffer zone and river corridor should form an essential/valuable part of green infrastructure. Any scheme to provide a buffer zone will need to include a working methods statement detailing how the buffer zone will be protected during construction.</p>
	Site Allocation 32: Pools on the Park and surroundings, Old Deer Park, Richmond	
Louise Fluker, The Richmond Society	Site Allocation 32 pp 123-24: Pools on the Park and surroundings, Old Deer Park, Richmond	we agree with the Council's position
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Site Allocations 32 and 33	Site allocations 32 (Pools on the Park and surroundings, Old Deer Park) and 33 (Richmond Athletic Association Ground, Old Deer Park) are in relatively close proximity to Kew Gardens. RBGK support the continued use of these sites for sports use, however, do not support any development that would adversely impact on the setting, views, heritage context etc. of the Gardens.
Peter Willan and Paul Velluet, Old Deer Park Working Group	Site Allocation 32: Pools on the Park and surroundings, Old Deer Park, Richmond	<p>The fourth bullet-point in the draft text needs to be amended to refer to the fact that at present the Statement of Significance is only in an incomplete draft form and needs to be amended before formal adoption in order to take full account of the particular special interest and significance of the listed pools complex and its landscaped setting. (In this connection, the Old Deer Park Working Group has been pressing the Council to undertake such amendment repeatedly since March, 2018. The text also needs to take account of the repeated requests by the local community over the last forty years for the Pools complex and its surrounding landscaped setting to be designated as Metropolitan Open Land, like the parkland which surrounds them).</p> <p>Supporting document/evidence: Urban Design Study December 2021 (Character Area G1) Old Deer Park Conservation Area Statement Old Deer Park: The Crown Estate Landscape Strategy 1999 Old Deer Park Supplementary Planning Document 2018 Draft Statement of Significance Old Deer Park: The Crown Estate Landscape Strategy 1999 Old Deer Park Supplementary Planning Document 2018</p>
Catherine Rostron	12 Place-based Strategy for Kew, Site Allocation: Pools on the Park / Old deer park	<p>I agree the facilities located here could be improved and extended. The borough lacks youth facilities which would make a great addition to the sports facilities.</p> <p>In addition the site does provide great opportunities for habitat enhancement, re-wilding etc. The current open space is characterless and underused.</p>
	Site Allocation 33: Richmond Athletic Association Ground, Old Deer Park, Richmond	
Louise Fluker, The Richmond Society	Site Allocation 33 pp 125-6: Richmond Athletic Association Ground, Old Deer Park, Richmond ;	we agree with the Council’s position
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Site Allocations 32 and 33	Site allocations 32 (Pools on the Park and surroundings, Old Deer Park) and 33 (Richmond Athletic Association Ground, Old Deer Park) are in relatively close proximity to Kew Gardens. RBGK support the continued use of these sites for sports use, however, do not support any development that would adversely impact on the setting, views, heritage context etc. of the Gardens.
Peter Willan and Paul Velluet, Old Deer Park Working Group	Site Allocation 33: Richmond Athletic Association Ground, Old Deer Park, Richmond	<p>No change proposed.</p> <p>Supporting document/evidence: Urban Design Study December 2021 (Character Area G1) Old Deer Park Conservation Area Statement Old Deer Park: The Crown Estate Landscape Strategy 1999 Old Deer Park Supplementary Planning Document 2018</p>
	Place-based Strategy for Mortlake & East Sheen	
William Mortimer	13 Place-based Strategy for Mortlake & East Sheen 14 Place-based Strategy for Barnes	<p>My key concerns for the redevelopment of Stag Brewery are the stresses on the riverside corridor imposed by the addition of 1,114 new dwellings and a proposed secondary school. The latter is not anticipated in the 2011 plan and would occasion at least 2400 movements per day in addition to those generated by the inhabitants of the new dwellings.</p> <p>Aside from the architecture, which has improved in the new plan I have raised issues about the impediments for disabled persons, wheel chair users and young mothers unless there are development at Mortlake station to enable the tracks to be crossed when the gates are closed. I foresee accidents at the railway crossing occasioned by more pedestrians and cyclists trying to cross when barriers are rising or falling and some will be fatal. The solution should be the enhancement of the station itself to provide a wheelchair-friendly underpass. Steps just will not do.</p> <p>Gently sloping and wide corridors with booths for tradespeople to the side would make travellers and locals welcome on arrival or train departure or simply traversing the tracks to and from East Sheen.</p>

		<p>I am also concerned that the number of dwellings (approximately a quarter of the entire number of dwellings in Barnes if I am not mistaken) will place a load on the water management of rain and dirty water draining built by the Victorians Alas Richmond is not connected into the Super Sewer and we must be assured that the consequence of the new development will not be raw sewage dumping in the Thames or more frequent flooding.</p> <p>Apart from the loss of the Medical Centre amenity in the new plan, which will add to travel for vulnerable and elderly people my calculation is that only half the school children will exercise every two weeks and half those will be on MUGA rather than a full-sized pitch.This hardly bodes well for the provisioning of a healthier environment in an ecologically friendly new build.</p> <p>In terms of Affordable housing there are no specifics in terms of the Social housing element including provisions for key workers and Special Needs young persons who have completed their school years and therefore required supervised living provisions.</p> <p>The laudable efforts to reduce traffic on the A3003 have not been helped by a toatal absence of imagination for the use of the river Thames in its historical role as the transport artery of London. In redeveloping the waterfront for the leisure users it is a major flaw not to bring the catamaran service which terminates today in Putney right up the river to Richmond. Mortlake would be a stop on the route and like Barnes has historically been used for the transportation of goods as well as people.. This would also reduce traffic via Chalker's Corner which is a pollution black spot.</p>
Richard Carr, Transport for London (TfL)	Place Based Strategy for Mortlake and East Sheen - Other Initiatives	<p>We note the reference to a potential cycle route between Mortlake and East Sheen in TfL's Cycling Action Plan. This is indicative and more work will be required to determine the actual alignment of any cycle route.</p>
Theresa Oddelm, The Royal Parks	Place-based Strategy for Mortlake & East Sheen – comments specific to biodiversity and the Royal Parks’ Environmental Designations	<p><u>Area Profile (page 127)</u> This needs greater recognition of the nature conservation designations of Richmond Park (SAC, SSSI and NNR) as immediately adjacent to the area.</p> <p><u>Policy (page 101)</u> Whilst this policy encourages 'active travel and exercise', it should also identify the need to protect Richmond Park SAC, SSSI and NNR from impacts associated with recreational pressure, as well as other impacts associated with development, including increased traffic and light spill.</p> <p>It should also include measures to reduce traffic in the vicinity of, and through, Richmond Park.</p>
Myrna Jelman	General comment in relation to Upper Richmond Road (West) as a growth corridor	<p>I was very disappointed to discover that Upper Richmond Road (West) was identified as a ‘strategic road corridor with growth potential’ (See your map below). This is completely out of keeping with the look and feel of the local area and I am very unhappy about this. Similarly, Manor Road may be ‘ripe for development’ in your view but I imagine you allowing Mid-size development along its length of up to 5 storeys, also negatively changing the look and feel of the area.</p> 
Tim Catchpole, Mortlake with East Sheen Society	Place-based Strategy for Mortlake & East Sheen	<p>Our Society has a sub-group of six who have looked at your document comprising an Urban Planner, Architect, two Heritage Experts (both ex-English Heritage), Transport Planner and Civil Engineer. Our comments, which have been arranged in accordance with your sequence of sections, have been considered and approved by our Committee of ten.</p> <p>We agree with this. However, we have a slight disagreement with your boundary of our area. You describe Mortlake & East Sheen as a ‘place’ (previously as a ‘village’) and define its boundary according to the character area boundaries identified in your Urban Design Study (see figure below), whereas our Society has always defined its area as based on the Parish boundary of Mortlake with East Sheen (see figure below alongside). In our view the Parish boundary equates better with the catchment area not only of the shopping centre but also of the cultural quarters (as referred to in your Update Plan) which include our churches, these being used for a variety of cultural events, not just for worship.</p> <p>It should be noted that the Parish of Mortlake with East Sheen includes the Mortlake Crematorium and its adjacent cemetery and excludes Christ’s School and its adjacent cemetery.</p> 

		<p>We agree with the definitions of character areas H1, H2 and H3 but there seem to be problems with the boundary between H4 and H5. In particular, Martindale and Spencer Gardens on the north side of Christchurch Road are in character with H4, not H5, and Sheen Mount Primary School is split between both character areas, which makes no sense. This boundary needs refinement. The area profile does not mention the cemeteries in our area, of which there are several, including their importance as open spaces. Nor does it mention the important archaeological interest on the Brewery site.</p> <p>We are pleased to see the focus on our town centre including improvement of the public realm and creation of public areas at Milestone Green and elsewhere. However, this needs to be tempered with an appraisal of the air quality in our town centre and what can be done to improve it.</p> <p>We note your comment on the public realm at Mortlake Station. We have argued several times before that this area needs to be a ‘site allocation’ (indeed it was such in a previous Local Plan some ten years ago) and are disappointed to see your answer that this is unlikely given the fragmented ownership. This is not true – there is a single ownership, namely Network Rail.</p> <p>We are pleased to see your mention of the Mortlake Riverside and the Thames Path but would like to have seen some reference to the river’s arcadian setting mentioned in the Mayor’s recent verdict on the Brewery development.</p>
George Goodby, Environment Agency	Place-based Strategy for Mortlake & East Sheen	<p>The local authority should include ‘improving/enhancing the riverside environment’ under the ‘vision’ section and bullet point 6 of policy section.</p> <p>We would also like the local authority to include ‘replacing active flood defences (e.g. flood gates) with passive ones (e.g. walls and embankments). If new developments are unable to design out these features, they should reduce flood risk by raising the sills of these structures’.</p> <p>Recommended action: We recommend you include improving and enhancing the riverside environment as well as replacing active flood defences (such as flood gates) with passive ones (such as walls and embankments).</p>
Max Millington	Place-based Strategy for Mortlake & East Sheen	<p>- Page 129/341 – Vision for Mortlake – note the reference to a ‘village’ – which is consistent with the 2011 APB (reaffirmed by the present Local Plan) which refers to making a “new village heart for Mortlake”. Site development applications should be consistent with this ‘village’ approach, not an urban approach. The statement at page 130/341 is prima facie inconsistent with this: “At Stag Brewery (Site Allocation 34) there is a significant opportunity to create a new quarter for living, with recreational and commercial uses to generate vibrancy, local employment, - community and leisure opportunities”.</p> <p>- The following statement (same page) is also inconsistent by referencing a ‘town’ instead of a village: “The redevelopment will create vibrant links between the River and the town”</p>
Anna Russell-Smith, Montagu Evans on behalf of South West London and St George’s Mental Health NHS Trust	Place-based Strategy for Mortlake & East Sheen	<p>The site falls in area H2 (Mortlake Residential) within the ‘Places-based Strategy for Mortlake and East Sheen’ in which it states that ‘Barnes Hospital (Site Allocation 37) redevelopment is expected to provide a new SEN school and health centre, along with residential’.</p> <p>As set out above there is a currently extant outline planning permission for these uses, however, subject to other policies within the plan (as discussed below), this paragraph should be amended to reflect the policy position if the requirement for the community uses changes / falls away.</p>
	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	
Samantha Powell, Department for Education	Place-based Strategy for Mortlake and East Sheen - Site 34 Stag Brewery, Mortlake	<p>DfE support the site allocation for Stag Brewery site to facilitate delivery of a secondary school and meet clearly identified need for this provision. DfE Pupil Place Planning Team have confirmed that this area contains only three (Christ’s, Grey Court and RPA) of the borough’s 11 state-funded secondary schools and has experienced a sizeable demand for places for some years. Due to space and planning constraints at the three existing schools, this demand could not be addressed through permanent expansion of one or more of them. The projected shortfall of secondary places in 2025/26 in this area is at both phase and year of entry level, without even taking into account need that will arise from additional development being built locally. This area is one of the areas in London which does not have a large surplus of school places; in 2021 there were 112 unplaced Y7 pupils, with two of the three existing schools in the planning area operating bulge classes for three years until the new free school opens. Delivery of the secondary school on this site will therefore clearly help to address this identified need.</p>
Richard Carr, Transport for London (TfL)	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>We note the statement that ‘<i>The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where necessary improvements to sustainable modes of travel, including public transport facilities, are secured as part of any development proposal. The opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site should be investigated as part of the comprehensive redevelopment.</i>’ Although we support the requirement for bus standing space within the development site, TfL does not support the closure of Avondale Road Bus station. The proposed bus standing within the Stag Brewery site should be regarded as additional to, and independent of, the bus stops and turning facility at Avondale Road.</p>
Katie Parsons, Historic England	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>The heights for this site set out in Appendix 3 reflect those set out in the adopted site-specific SPD which have been generally accepted as appropriate. Links back to the Urban Design Study are helpful but the policy would be improved by drawing out some of the particular aspects of the site’s significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base</p> <p>An archaeological Desk Based Assessment will be required for this site as it is located within the Tier 2 Mortlake APA given the potential for Palaeoenvironmental/Prehistoric remains; a medieval church and cemetery; the Archbishop of Canterbury’s Palace (potentially of national significance); a house associated with Thomas Cromwell (potentially of national significance); the historic development of the Stag Brewery whose origins may date back to the 15th-century. GLAAS should be consulted at an early stage to advise on place making and public benefit.</p>
Myrna Jelman	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>I urge you to not only protect the playing fields but also create a neighbourhood park/garden in that location, preferably with an indoor/outdoor cafe in the garden to add to the sense of the heart of the village/community. This will be the only opportunity to do this for decades to come</p>
Tim Catchpole, Mortlake with East Sheen Society	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>We are pleased to see the reference to the Stag Brewery Planning Brief and the continuation of its 7- storey height limit which has been reinforced in your recent Urban Design Study. That said, we continue to disagree that “there is a clear need for a new 6-form of entry secondary school plus 6th form” replacing the primary school in the Brief, our reasons being as follows:</p> <ul style="list-style-type: none">• There is no demand for the secondary school as primary school numbers have been in steady decline for the last ten years.• It will threaten the viability of the 6th forms at RPA and Christ’s School;• It will deny the possibility of Thomson House Primary School relocating onto the Brewery site from its current two sites which are split by the railway, both sites lacking any open space and one of the sites being exposed to traffic intimidation in Sheen Lane next to the high-risk level crossing;• It will reduce the land requirement for housing and its affordable component (the primary school would have had a much smaller land requirement);• It will require the existing playing fields to be all-weathered and equipped with unsightly fencing and floodlights (the primary school would have allowed retention of the existing grass playing fields);• It will generate large numbers of cyclists and pedestrians encountering problems at the level crossing on Sheen Lane and at the crossing of the heavily trafficked Lower Richmond Road. <p>We note the statement that “it may be acceptable to re-distribute the designated OOLTI within the site provided that the new open area is equivalent to or improved in terms of quantum, quality and openness.” We continue to maintain that the re-distributed OOLTI into a series of courtyards, which will be overshadowed and will likely become private open spaces in gated communities, represents a failure in terms of both quality and openness.</p> <p>Mention is made of the Archaeological Priority Area but this needs elaboration. The site includes the suspected remains of both the Archbishop’s Palace and Cromwell House.</p> <p>There is no mention of flood-risk and the need to install storm surge flood mitigation measures to ensure that surrounding areas of Mortlake are protected.</p>

		Please note that our comments on Site Allocation 34 The Stag Brewery may – or may not – change in the course of the next few months when we come to comment on the forthcoming applications due for submission on 7 February. We aim to consult our wider membership on these applications and will revert to you in due course.
David Abel	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>Redeveloping the site is a laudable and necessary aim. Providing a new heart for Mortlake is also laudable. Developing it to such an extent and such density is not however. I question the need to a school as do many others. I question the density of the buddings and the lack of definitive provision for affordable housing. I question to the lack of any form of industry on an ancient industrial site.</p> <p>Changes considered necessary: Reversion of heights of building to the original 2011 plan would go a long way to making these proposals desirable. Engagements with the Mortlake Brewery Community Group who actually live in the community that you’re trying to provide a new heart for and who have a fairly detailed proposal would be better still.</p>
David Deaton	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	The need for the secondary school on this site is highly questionable, as the submission by the Mortlake Brewery Community Group demonstrates It would be better to relocate Thompson House School (a primary school with limited play area) to the brewery site and so ease congestion at the level crossing.
Max Millington	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>- Page 131/341 – Site allocation 34 – The reference to the requirement for a new secondary school, plus sixth form, is not supported by the evidence base without material forecasting uncertainties from a council that has consistently over-projected demand relative to what has in fact transpired – material question marks must accordingly be placed on the Council’s forecasting methodology or application in the present case. The Mortlake Brewery Community Group has produced a detailed evidence base demonstrating that there is in fact NO requirement for places that cannot be discharged by temporarily expanding existing schools, which will be negatively impacted by any further provision of a large secondary school and sixth form.</p> <p>- Further, the impact of such a decision would be disproportionate taken in context of the other proposed uses references, not least in relation to traffic and emissions of noxious gases. To require the same would be inconsistent with many other policies. Delete reference to “The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required.” Or replace the references to secondary and sixth form with primary.</p> <p>- Furthermore (same reference) a primary school will be required to respond to anticipated local demographic change across the relevant period, primarily by reason of development of the Stag Brewery site, but also the development of the Barnes Hospital site and the Homebase scheme (all of which will have the impact of displacing existing catchment areas, and which have evolved since the present Local Plan). For instance, the Homebase scheme will fill Darell, while the Stag and Barnes Hospital schemes will fill Thomson House. Leaving other local neighbourhoods displaced from barely satisfactory existing catchments – e.g. Kingsway/Shalstone, Williams Lane, Wadham Mews and north Mortlake.</p> <p>- It is a legal obligation to provide sufficient primary school places – and the National Planning Policy Framework expressly references adequacy of primary school places locally, the reason being that young children simply cannot travel unaccompanied and can only travel for shorter distances. It is not, for instance, acceptable to require parents and pupils in Mortlake to travel to North Barnes at Lowther, a 4km round trip.</p> <p>- LBRuT to please make available the evidence base showing that these obligations will be discharged, including the basis of proposed residential tenure split at each new property (which, we anticipate, will primarily be 1BR and 2BR units housing more primary school age pupils than secondary).</p> <p>- Ideally planning for future primary school provision will involve moving Thomson House school (2FE) to the site, expanded by 1 FE if projections justify the same. This will have the added benefit of materially increasing pupil safety (in response to LBRuT’s duty of care) as (i) the school’s only existing recreation space is open to the public – moving the school to the playing fields would alleviate this and (ii) move the school away from the dangerous level crossing – barely a day goes by when there isn’t a near miss, which LBRuT simply must acknowledge and mitigate.</p> <p>- Detailed context bullet points – bullet point 1 – “The Council has produced and adopted the Stag Brewery Planning Brief SPD in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site’s characteristics, constraints, land use and development opportunities. Any proposed development should have due regard to the adopted brief.” To add the following text after brief, “ , which was subsequently reaffirmed as the appropriate basis for development in the 2017 Local Plan”.</p> <p>- Detailed context bullet points – bullet point 3 – “There is a need to create a new heart for Mortlake“. Add in reference to new village heart for Mortlake per 2011 SPD.</p> <p>- Detailed context bullet points – bullet point 4 – “There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area, as set out in the Council’s School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.” As per the detailed rationale set out above, to delete / qualify this accordingly to remove reference to need for a secondary school / sixth form and to reference the need for an expanded local primary school (including moving Thomson House to the site). The need is anything but clear.</p> <p>- Further, in view of the negative impact of LBRuT’s determination (however incorrect) that a secondary school is required, due assessment must be made of alternative sites for locating a secondary school. That should consider all material factors, including accessibility, impact on emissions, risk of places being lost to out-of-authority pupils – it is not appropriate to limit this assessment (as was previously the case based on materials provided by LBRuT) to ease of navigating planning restrictions – that is but one factor that can be navigated. Barn Elms would represent a significantly better location holistically than cramming a new secondary school into such a small site. 24.31 to be reworded accordingly.</p> <p>- Detailed context bullet points – bullet point 8 – “The provision of residential uses (including policy compliant affordable housing) will ensure that the new heart of Mortlake becomes a vibrant centre for new communities.”. To expressly provide for allocation of affordable housing of appropriate tenure mix spread across the site and avoiding a concentration of affordable housing in any one area (having regards to the existing local context).</p> <p>- Detailed context bullet points – bullet point 10 – AQFA – delete reference to ‘pupils at the secondary school’, as this unnecessarily limits the application of the provision. In particular, regard should be had to impact on Working Mums nursery adjacent to the site – my son picked up asthma whilst there almost certainly owing to the traffic on the Lower Richmond Road which it is imperative for public health does not become more congested/result in higher levels of emissions. I am far from persuaded by the Stage Brewery site applicant’s EIA data and would call upon LBRuT to procure a second, independent traffic and emissions assessment in reliance on this provision (among other requirements).</p> <p>- Detailed context bullet points – bullet point 12 – “The playing fields in the south west corner of the site, which are designated Other Open Land of Townscape Importance (OOLTI), should be retained and/or reprovided and upgraded. In the event of reprovicion and upgrading, where a comprehensive approach to redevelopment can be taken in line with Policy 36, it may be acceptable to re-distribute designated OOLTI within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness. In addition, reprovicion and upgrading of the playing fields within the site for sport uses has to be carried out in line with Policy 37, the NPPF and Sport England Policy”. The playing fields should be retained in line with existing OOLTI policy, as well as multiple provisions of the NPPF, with any reprovicion scrutinised in line with policy allowing the same in truly limited circumstances, which have not been made out on the basis of the present development application. For the avoidance of doubt, roads, a school and a bus turnaround would not satisfy these requirements – and any area with a fence around it will cause the space to cease to be ‘open’.</p> <p>- Further, the reference to ‘within the site’ is not appropriate: the OOLTI designation is provided for the benefit of immediately local stakeholders, not for those up to a kilometer away elsewhere on the proposed site. This has not been adequately assessed to date in relation to existing applications.</p> <p>- Further, LBRuT / planning inspector to advance an application at the community’s request for designation of the playing fields as Local Green Space – ideally at this juncture, but in any event if no successful planning application is brought forward within the next year.</p> <p>- Detailed context bullet points – bullet point 14 – “There is potential opportunity in the tall building zone (7 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones, although the Urban Design Study 2021 recognises the limits due to the sensitivities of the surrounding context.” Please be more specific as to which areas these are</p>

		<p>and add an express reference at the end as follows: “... and the requirements of the [2011 SPD] that taller buildings should be located at the centre of the site and the heights should decline towards the perimeter of the site”</p> <p>- Add bullet point referencing condition of adequate improvements being made to the dangerous level crossing in the vicinity to mitigate any potential aggravation otherwise flowing from the proposed development. These changes should be made in consultation with Network Rail and local stakeholders.</p> <p>- Ownership: is stated to be private. Please note there is a public footpath running to the north of the development site (east to west), which needs to be restored to the same having been fenced off. This has been reported to LBRuT on several occasions but has not yet been addressed.</p> <p>- Page 301/341 – 24.31 – in line with earlier comments, replace reference to Stag Brewery secondary school including sixth form with primary school.</p> <p>Amendments, deletions and supplemental statements as stated above, for the reasons stated above.</p> <p>Please consider these comments alongside the detailed representations made (for myself and on behalf of the Williams Lane and Wadham Mews ad hoc residents group) in relation to the present 2017 Local Plan, as if set out in full (mutatis mutandis) in these representations.</p> <p>For context, I am a resident of Williams Lane, Mortlake (SW14) and live immediately adjacent to the site the subject of Site Allocation 34 (the Site). I have acted as the ‘Community Liaison Group’ (CLG) attendee advocating (on an ad hoc basis) the views of a group of Williams Lane & Wadham Mews residents (the Group) in relation to extant planning applications for the Site since 2017. As far as I am aware, this statement represents the general consensus of the Group’s views on the Applications. However, this response is strictly supplemental to any individual responses the Group may wish to make and should be read accordingly.</p> <p>The Group moved into the 2011 Development upon construction in December 2011, following adoption by LBRuT of the 2011 SPB, which itself followed a site-specific consultation. The 2011 Development is shown in the SPB Scale and Uses Plan as the ‘Approved residential development’. The 2011 Development comprises some 17 houses and 64 flats, approximately 170 residents. The Group requests that appropriate weight be given to the responses set out below as residents directly affected by the proposed development. We relied heavily upon LBRuT’s then freshly-adopted APB in making an investment and life decision to move here 10 years ago, and which was substantially restated as the appropriate basis for development just 4 years ago in 2017. The proposed development, if insensitively pursued in line with the applicant’s present proposals, in particular the secondary school, could blight the lives of the residents both during the construction phase and for many years to come, whilst depriving the existing community and future generations of key assets that make Mortlake a green, natural, predominantly sub-urban, village site.</p>
David Wilson, Thames Water	The Stag Brewery Lower Richmond Road Mortlake London SW14 7ET	<p>Thames Water Site ID: 65562 (Approved 12/6/20, Reviewed Sep 21)</p> <p>Water Response</p> <p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response</p> <p>The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development. On the information available to date we do not envisage concerns regarding wastewater treatment capacity in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>Regarding surface water discharge, we would expect this to be discharged directly to the River Thames due to its proximity in line with SI.13 of the London Plan.</p>
George Goodby, Environment Agency	Site Allocation 34: Stag Brewery, Mortlake and East Sheen	<p>This site is located within the fluvial / tidal Flood Zone 3 and is within close proximity to the statutory Thames Tidal flood defences. Therefore, planning applications must consider the TE2100 raising requirements in their design. We recognise that a recent planning application has been submitted but highlight that any future application must have a fixed flood defence line and remove any flood gates. We strongly recommend that a bullet point is added to promote a Riverside Strategy Approach to flood defence raisings and that clarifies the ambition to remove any active flood defences in preference for a fixed flood defence line.</p> <p>Recommended action: Add a bullet point to Site Allocation 34: Stag Brewery recommending a Riverside Strategy Approach to achieving the TE2100 Plan flood defence raisings and the ambition for a permanent fixed flood defence line.</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>The area contains Stag Brewery (Site Allocation 34) where there are current proposals to redevelop the site, including a significant number of new homes.</p> <p>The CCG has been engaged in the planning applications for the site, noting that a new application is likely to be submitted following the refusal by the Mayor of London at a representation hearing in July 2021.</p>
Philip Briggs, Richmond Bat Species Action Plan Steering Group	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	[See comment in relation to biodiversity]
	Site Allocation 35: Mortlake and Barnes Delivery Office, Mortlake	
Ugne Staskauskaite, Cushman & Wakefield on behalf of Royal Mail Group	Site Allocation 35: Mortlake and Barnes Delivery Office, Mortlake	<p>On behalf of our client Royal Mail Group Limited (‘Royal Mail’), Cushman and Wakefield have been instructed to submit a representation to the London Borough of Richmond Upon Thames Draft Local Plan: Pre- Publication Version (2021), in relation to Proposed Site Allocation 35: Mortlake and Barnes Delivery Office, Mortlake.</p>

		<p>Under section 35 of the Postal Services Act 2011, Royal Mail is the UK’s designated Universal Postal Service Provider, supporting customers, businesses and communities across the country. This means it is the only company to have a statutory duty to collect and deliver letters six days a week at an affordable and geographically uniform price to every address in the UK. Royal Mail’s services are regulated by Ofcom.</p> <p>The Act provides that Ofcom’s primary regulatory duty is to secure the provision of the Universal Postal Service and includes a set of minimum standards for Universal Service Providers which Ofcom must secure. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.</p> <p>Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Meeting Universal Service Provider obligations is in the public interest and this should not be affected detrimentally by any highways or development project.</p> <p><u>Mortlake and Barnes Delivery Office - Existing Use</u></p> <p>Royal Mail currently occupies and are the freeholder of Mortlake and Barnes Delivery Office, Proposed Site Allocation 35.</p> <p>The Delivery Office accepts mail before sorting and distributing it within the local area. Vehicular access for Royal Mail vehicles (7.5-tonne delivery lorries and standard vans) is from Vineyard Path into a Delivery Office. The site is responsible for operational delivery vehicles, with members of staff employed at the site and responsible for the loading and unloading of mail.</p> <p>The site is operational 24 hours a day, 6 days a week, with the only non-operational hours being between 17.00 Saturday and 10.00 on Sunday. Throughout the day mail arrives and is unloaded and sorted in the service yard, and then reloaded onto delivery vehicles for their rounds.</p> <p><u>Representation</u></p> <p>Cushman & Wakefield has reviewed the London Borough of Richmond on Thames Draft Local Plan: Pre-Publication Version in the context of its impact on the operations of the Royal Mail’s properties within the borough. The delivery office is of strategic importance to Royal Mail in ensuring they are able to continue to fulfil their statutory duty for mail collection and delivery. The subject of this representation is to make the London Borough of Croydon aware of Royal Mail’s operations within the borough. These representations made on behalf of Royal Mail are in reference to the Proposed Site Allocation 35: Mortlake and Barnes Delivery Office.</p> <p><u>Site-Specific Allocation</u></p> <p>Royal Mail has reviewed their operational property requirements and confirmed Mortlake and Barnes Delivery Office is to remain in operation. The site is not currently available for development. Mortlake and Barnes Delivery Office falls under Site Allocation 35. The policy proposes that the site could be allocated for employment or other commercial and retail uses in this area if the site would become surplus. Only if the employment and other commercial or employment uses have been explored and options discounted in line with other policies in the Plan, would the provision of housing (including affordable housing) in upper floors as part of the mixed-use scheme be considered as a potential redevelopment option.</p> <p>Royal Mail is supportive of the proposed allocation of Site Allocation 35: Mortlake and Barnes Delivery Office for redevelopment, should Royal Mail operations at this site would cease or be relocated in the future. However, this should refer to mixed-use developmentto support the council in delivering other objectives of the Plan, including new homes.</p> <p>We request the wording of Site Allocation 35: Mortlake and Barnes Delivery Office is amended as following:</p> <p>Site Proposal: If the site is declared surplus to requirements, appropriate land uses including employment, commercial, retail and residential uses.</p> <p>Context: The site is located within the Mortlake Area of Mixed-Use. As of 2021, Royal Mail has no plans to relocate operations from this delivery office. However, if the site is declared surplus to requirements by Royal Mail in the longer term, the evidence suggests there is a need for employment or other commercial and retail uses in this area. Such provision should create an attractive frontage to the High Street. The provision of housing (including affordable housing) in upper floors as part of a mixed-use scheme should be considered as a potential redevelopment option.</p> <p>Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal on this site should have regard to, is also set out in the Urban Design Study 2021 in the character area profile and design guidance for H1 Mortlake Riverside and the Mortlake Village Planning Guidance SPD.</p> <p><u>Summary</u></p> <p>Royal Mail would welcome further engagement with the London Borough of Richmond of Thames in relation to the proposed allocation and availability of the site. Royal Mail supports a mixed-use allocation of the site on the basis set out above, only where the site becomes surplus, to fully contribute to the aims of the Plan, including new employment and housing provision.</p>
Tim Catchpole, Mortlake with East Sheen Society	Site Allocation 35: Mortlake and Barnes Delivery Office, Mortlake	No comment.
	Site Allocation 36: Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen	
Tim Catchpole, Mortlake with East Sheen Society	Site Allocation 36: Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen	The guidance should note that planning permission has recently been granted for change of use from a retail warehouse to a gymnasium, now implemented. No further comment except to note that the rear end of the gymnasium site and the closed access to the site off Paynesfield Avenue continue to be derelict and unsightly.
	Site Allocation 37: Barnes Hospital, East Sheen	
Samantha Powell, Department for Education	Place-based Strategy for Mortlake and East Sheen - Site 37 Barnes Hospital site, East Sheen	<p>DfE support the site allocation for a SEND school on Barnes hospital site, East Sheen. The need for SEND school provision is generally rising across all LPAs; the SEND need in Richmond is clearly acknowledged and new provision appropriately promoted through this Local Plan site allocation. DfE’s support for the project is evident through the approval of a SEND/AP Wave 2 Free School application in 2019 and funding in whole or part through the Council’s Safety Valve Agreement with the Department, a condition of which is that the Council must expand specialist provision to avoid placements in non-maintained special schools and independent special schools.</p> <p>Although outline planning permission was granted in 2020, further feasibility undertaken since demonstrates that the site area for the school is significantly smaller than is usually required. As a result, efforts are being made between the parties to optimise the site area and provide much needed community services. The final site layout may therefore be different to that approved in outline.</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Site Allocation 37: Barnes Hospital, East Sheen	We note the Site Allocation for Barnes Hospital (no 37) where outline planning permission was granted in 2020 for a mix of uses including a health centre, Special Education Needs (SEN) school and residential use. The Context text refers to the possibility of locating primary and/or community health services on this site should be investigated. The approved outline permission includes a new healthcare facility which will accommodate mental health outpatient services provided by South West London and St George's Mental Health NHS Trust. Whilst the proposed residential element will have an impact on primary healthcare services, there will not be the need to relocate primary health services onto the site.
Tim Catchpole, Mortlake with East Sheen Society	Site Allocation 37: Barnes Hospital, East Sheen	There is no clear guidance about the height and density of the housing development and what can be accepted in relation to the poor access from South Worple Way. Planning permission has since been granted in outline for 83 housing units which we believe to be the absolute maximum. Any increase in this quantum, as currently proposed, should not be considered.
Anna Russell-Smith, Montagu Evans on behalf of South West London and St George’s Mental Health NHS Trust	Site Allocation 37: Barnes Hospital, East Sheen	<p>Background</p> <p>Before setting out our comments on the above matters, we set out a brief overview of the South West London and St Georges Mental Health NHS Trust (SWLSTG), in particular in relation to Barnes Hospital, South Worple Way, London, SW14 8SU, which falls within the administrative area of Richmond upon Thames.</p> <p>The Trust was established in December 1994 and provides local mental health services to approximately 1.2 million people in South West London. The Trust have embarked upon a much needed programme for the modernisation of mental health facilities serving south west London of which Barnes Hospital, which falls within the LB Richmond, forms part of.</p> <p>Outline planning permission was achieved at Barnes Hospital on the 14 September 2020 for:</p>

		<p><i>“Outline planning permission for the demolition and comprehensive redevelopment (phased development) of land at Barnes Hospital to provide a mixed use development comprising a health centre (Use Class D1), a Special Educational Needs (SEN) School (Use Class D1), up to 83 new build residential units (Use Class C3), the conversion of two of the retained BTMs for use for up to 3 no. residential units (Use Class C3), the conversion of one BTM for medical use (Use Class D1), car parking, landscaping and associated works. All matters reserved save for the full details submitted in relation to access points at the site boundaries”.</i></p> <p>Subsequent to achieving outline planning permission the Trust have disposed of part of the Site to LS Estates to deliver the 83 residential units (which includes for up to 3 residential units in the conversion of the retained BTMs).</p> <p>LS Estates have proceeded with an amendment application (under application reference: 21/3107/FUL) which seeks approval for the following:</p> <p><i>“Drop-in full application to supersede the residential development zone of previously approved outline planning permission 18/3642/OUT. Demolition of existing structures and redevelopment of site including construction of three new buildings comprising 106 residential units of mixed tenure (Use Class C3), alterations and conversion of two existing buildings for 3 residential units (Use Class C3), car and cycle parking, landscaping and associated works”</i></p> <p>This application is still awaiting determination by the LB Richmond.</p> <p>National Planning Policy Context</p> <p>In preparing these representations significant weight has been given to national planning policy set by the National Planning Policy Framework (NPPF) (July 2021).</p> <p>Paragraph 9 of the 2021 NPPF requires sustainable development objectives to be delivered through the preparation and implementation of plans. Paragraph 11 of the NPPF requires that during the plan-making process, plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. Part b of paragraph 11 requires that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses.</p> <p>Section 3 of the NPPF deals with plan-making specifically and identifies under Paragraph 15 that the planning system should be genuinely plan-led. Paragraph 16 requires plans to achieve the following:</p> <p>a) be prepared with the objective of contributing to the achievement of sustainable development;</p> <p>b) be prepared positively, in a way that is aspirational but deliverable;</p> <p>c) be shaped by early, proportionate and effective, engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;</p> <p>d) contain policies that are clearly written and unambiguous, so it is evidence how a decision maker should react to development proposals; and</p> <p>e) be accessible through the use of digital tools to assist public involvement and policy presentation.</p> <p>With regard to Strategic Policies, Paragraph 20 of the NPPF states that Strategic Policies should set an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing, employment, retail, leisure and other commercial development, infrastructure for transport, community facilities and the conservation and enhancement of natural, built and historic environment.</p> <p>Paragraph 23 goes on to identify Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies).</p> <p>Turning to producing new Local Plans specifically, Paragraph 31 states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. Local Plans should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirement (Paragraph 32).</p> <p>The London Plan</p> <p>Consideration has also been given in the preparation of these representations to the new London Plan (2021) The new London Plan places emphasis on the need to build strong and inclusive communities (Policy GG1), making the best use of land (Policy GG2), creating a healthy city (Policy GG3), delivering the homes Londoners need (Policy GG4) and growing a good economy (Policy GG5).</p> <p>The following sections respond to specific policies outlined within the London Borough of Richmond upon Thames (LBR) draft pre-publication Local Plan.</p> <p>[See other comments]</p> <p>Site Allocation 37 (Barnes Hospital)</p> <p>Barnes Hospital is allocated under Site Allocation 37, which in principle is supported.</p> <p>The site has outline planning permission (ref: 18/3642/OUT) for new healthcare facility, a new SEN school and 83 residential dwellings. The Trust and LocatED are currently progressing further feasibility studies to ensure site opportunities are maximised for both a Health Centre and a SEN School.</p> <p>London plan Policy S1 part F states:</p> <p><i>“development proposals that would result in a loss of social infrastructure in an areas of defined need should be refused unless:</i></p> <p><i>2. The loss is part of a wider pubic service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services”.</i></p> <p>In addition paragraph 5.2.9 states that:</p> <p><i>“development and regeneration proposal for an area provide an opportunity to re-think how land and buildings are used and where there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities..”.</i></p> <p>The opportunity to deliver both a Health Centre and a SEN school is supported to respond to the need and demand within the Local Area Strategy. The Trust support the opportunity of alternative uses, such as housing, being considered as a potential redevelopment option on the basis that community and social infrastructure have been explored. However the policy should reflect London Plan Policy S1 regarding loss being part of a wider transformation plan seeking to invest in modern, fit for purpose infrastructure and facilities.</p> <p>Closing</p> <p>We trust that these observations are useful at this consultation stage. We wish to maintain an active role in the engagement process moving forward and look forward to receiving an update as LB Richmond upon Thames proceed forward with their emerging Local Plan.</p>
George Goodby, Environment Agency	Site Allocation 37: Barnes Hospital, Mortlake and East Sheen	This site is currently located within Flood Zone 1. However, we are due to review our Beverley Brook flood modelling in the future which could potentially result in a higher flood risk designation on this site. This could impact any sequential testing of the site in the future.

		<p>We note that Site Allocation 36: Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen is also within the Beverley Brook catchment. However, no flood risk designation changes are expected for this site.</p> <p>Recommended action: No current action required from the LPA.</p>
	Place-based Strategy for Barnes	
Emma Robinson, Barnes Community Association		<p>On the specific points in the Place-based strategy for Barnes (14) we make the following comments –</p> <p>Strengthen the role and function of the area’s distinctive Barnes local centre and encourage independent shops, and support the neighbourhood centre of Castelnau to ensure day-to-day facilities are accessible, in accordance with Policy 1 Living Locally.</p> <p>We support this ambition with a particular focus on the Castelnau shopping parade. We applied to the Community Fund in 2020 for a grant to improve the area and were unsuccessful for a number of reasons. Obstacles to improvement in the area have so far been unsurmountable so we would welcome the Council’s support to implement positive changes to uplift the neighbourhood and to improve the vibrancy of the shopping parade.</p> <p>Enable future pedestrianisation of A3003 in Barnes centre to make the area more permeable and reduce the prominence of traffic. This will present an opportunity to create public realm for dwelling as opposed to the existing, narrow and transient pavements along Barnes High Street.</p> <p>We fully support this sentiment and, following the successful application to the Community Fund in 2019, we have been working with Council Officers to implement a scheme to deliver improvements to Barnes High Street. This scheme aims to reduce the dominance of traffic in the area and is an opportunity to deliver improvements to the public realm with wider pavements, re-allocation of parking bays to reduce traffic congestion and a new east-bound bus stop.</p> <p>We have long had an ambition to see the closure of Barnes High Street on key dates in the Barnes calendar. With the temporary diversion of buses down Nassau Road now possible, we would welcome the opportunity to work with the Council on a full road closure on event days.</p> <p>Consider opportunities to improve connectivity including the High Street to Barnes Green and to the Riverside and Thames Path route. The desire to improve connectivity between Barnes Green and the river, the green and the blue, was a key theme of the Big Barnes Ponder of 2013 when residents came together to describe their vision for the future of Barnes. The aim was to draw people from the Green, down the High Street to the river.</p> <p>A key feature of our discussion at the Ponder was the fact that Barnes is a village on the river, and as such this should be the focus of our community, and yet it is impossible to get onto the water and very difficult to see it as the view is obstructed by an unattractive, concrete flood defence. An ambition of the Ponder was to remove a section of concrete flood defence at the end of the High Street and to replace it with glass so that the eye is drawn down the High Street to a view of the water. This is an entirely achievable ambition and with the Council’s support we could start a conversation with the Environment Agency and make it a reality.</p> <p>Improve the public realm to enhance the sense of arrival at Barnes Station, and reanimate streets as a local hub for shops, cafés, and small businesses, including around Priest’s Bridge.</p> <p>We identified the need to improve the sense of arrival at Barnes Station several years ago and applied for a Civic Pride grant for wayfinding maps in the area. Clearly more investment is needed to achieve our aim and we have been working with Friends of Barnes Common to ensure that the passage between the station and the village is as safe as possible. We have also had discussions with Council Officers about ensuring a safer crossing both at Station Road and at Mill Hill for pedestrians walking from the station to the village. We would welcome some support from the Council with this work.</p> <p>We have also been in discussion with Council officers about the need to review parking arrangements on Station Road which must be one of very few streets in the borough that are close to a station where you can park without restriction. This will help to prioritise local residents over out of borough commuters and eliminate the common occurrence of long-term parking of abandoned cars along this stretch.</p> <p>We agree that there is a need to improve the shopping area at Priest’s Bridge and improvements are also needed to support the businesses in White Hart Lane. We have been working with Council officers on a new parking scheme for the area which should enable businesses to attract customers from further afield. White Hart Lane is a destination shopping area with a number of businesses that necessitate customer parking for between 1 and 2 hours yet the area has very little parking within restricted hours.</p> <p>The Castelnau shopping parade needs support with reanimation. We have been trying to support local businesses with public realm improvements but have had little success (see above).</p> <p>Consider opportunities to enhance Barnes Riverside, preserving views along the Thames, and to maintain a sense of activity and vibrancy, with potential for temporary pedestrianisation of The Terrace to create café/restaurant seating or more width to improve pedestrian experience, reduce the perceived dominance of vehicles and better connect the townscape with the Dock Gardens and Thames Path.</p> <p>An ambition of the Big Barnes Ponder was to open up Barnes Riverside to water sports and recreational activities fitting to a village sited on a river frontage. This year we will be embarking on a project to enhance the area around Small Profits Dock and to encourage the use of the dock for water sports such as paddle boarding and rowing. We have already been in discussion with the PLA about the possibility of creating a river pool at the dock area, as this stretch of river is used in the summer months by a river swimming group. The PLA is receptive to a buoyed area for swimming and we will be pursuing this as part of our ideas for regeneration of the area. We would very much like the support and assistance of the Council with this project.</p> <p>Clearly to make this project a success we will need infrastructure and we have had positive conversations with Barnes Sports Club about the use of their facilities. We would like to see amenities such as a temporary coffee pop-up with outside seating for water sports users and for walkers along the towpath which is busy particularly at weekends.</p> <p>There is also an urgent need to resurface some sections of the Barnes towpath. In particularly the stretches from Small Profit Dock to Ferry Lane and between Queen Elizabeth Walk and Beverly Brook need attention. Both stretches of towpath are busy with recreational walkers as well as commuters and school children.</p> <p>The Council will support through partnership working proposals to investigate the feasibility to restore a green walkway along Barnes Bridge with step-free access at Barnes Bridge station.</p> <p>We welcome the Council’s support for project which will see a redundant Thames crossing restored to community use and will result in a major attraction for the borough, not just for Barnes. We look forward to working together to make this project a reality.</p>
Jamie Stewart-Liddon	Barnes section	<p>Station Road, SW13 – From the junction with Vine Road to Barnes Railway Station</p> <p>It was suggested by Emma Robinson, Barnes Community Association, that I contact one of Barnes’ ward councillors to comment on the above.</p> <p>I am sure you know the above approach to Barnes Railway Station and, when cars are parked there, how difficult is to pass if one meets a car coming the other way (possibly it should be made into a one way system). However, what I question is why on earth Barnes residents are providing free, unlimited parking to all and sundry. Barnes permit holders perhaps, but drivers from elsewhere – definitely not.</p> <p>We are all being encouraged to use public transport and without sufficient passengers SW trains would not be able to sustainably run their services. By providing all day free parking, non-Barnes residents are clearly driving in, parking and then jumping on the train for the last leg of their journey. I don’t think this is right.</p> <p>I believe it would perhaps best if this stretch of Station Road be made no parking, or at least pay and display, to prevent this happening. I hope this something the council might consider introducing.</p>
David Wilson, Thames Water	Barnes Hospital, South Worple Way, London, SW14 8SU	<p>Thames Water Site ID: 24141</p> <p>(Allocated site pending, Reviewed 10/12/21)</p> <p>Water Response</p>

		<p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage concerns regarding wastewater treatment capacity in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services.</p> <p>Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.</p> <p>We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: “A Trade Effluent Consent from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a Consent is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Consent enquiries should be directed to Thames Water’s Trade Effluent Team by telephoning 020 3577 9200 or by emailing trade.effluent@thameswater.co.uk .</p>
George Goodby, Environment Agency	Place-based Strategy for Barnes	<p>Pedestrianisation of ‘The Terrace’ must not over sail or impede the Environment Agency’s ability to inspect any tidal flood defence element. There should be no encroachment or overhanging of the River Thames. The last bullet point under the policy section should be amended to reflect this, if the terraces it refers to are adjacent to the River Thames.</p> <p>Recommended action: Clarify within the final context bullet point that The Terrace should not result in any encroachment on the River Thames, should not impede the Environment Agency’s ability to inspect any tidal flood defences, and should not impede any future raising requirements.</p>
William Mortimer	14 Place-based Strategy for Barnes	<p>The traffic planning for Barnes is based on an assumption that motor vehicle journeys will fall by 5% withing five years. It is to be hoped so otherwise the polluting air round the river end of the High Street will continue. Barnes residents still using the Kew dump have ridiculous levels of delay despite the short distance and a congested A3003 simply negates the good work being done to provide better quality air via the open spaces on the Commons.</p> <p>The Barnes Plan also refers to a Garden Bridge on the redundant third span of the railway bridge. This particularly reflects the lack of audit between the Local Plan and the Disaster management plan for the Borough. This span could be used for storing materials required when road and rail services have been seriously damaged and the river’s priority function will be to bring in men and materials to cope with evacuation of people and repair of dwellings. The idea of a garden has been dreamed up by people with little vision of the environmental future of the planet or the benefits to the community of a garden in the sky. Who will be paying for bridge maintenance and the gardening effort? Let's get real, we are facing a climate emergency, we line on a flight path to Heathrow and the world is at the mercy of terrorist activity possibly including 'dirty bombs'. These considerations must come before a garden.</p>
Unity Harvey	Place-based Strategy for Barnes	<p>[Comments also raised about local issues in response to big problems and I wondered whether you might know any way in which the Local Plan may help]</p> <p>Public wellbeing</p> <p>a. Transport With others I have been trying for 18 months or more to get <i>Transport for London to divert the 378 along Church Road and Rocks Lane via the Red Lion junction instead of Station Road and Mill Hill</i>. This would help hundreds if not thousands more people of all ages, especially now when Hammersmith Bridge is closed because it goes directly to the underground system at Putney Bridge Station. Not only would it help the local residents particularly old people saving energy and time, hundreds of cars pollute the atmosphere because there is no good bus service to the Enable Sports Centre from Fulham, Wandsworth or Wimbledon. The car owners do not stop in Barnes. Church Road businesses and the LWC would benefit from the route change. TfL would collect many more fares. Our MP and Councillors have been trying to help so far to no avail. All the policies would support this route change. <i>Is there any way the policies could be given more power in such an instance?</i></p> <p>b. Road Safety</p> <p>I have been trying since the summer in 2020 to have <i>the private road belonging to Wandsworth Council outside Nos. 5 & 7 Queen Elizabeth Walk restored to its original width so that two cars can pass. It lies in the Borough of Richmond and is blocked by a very high and wide beech hedge overgrown by about a metre into the road</i>. There is no footpath and it is used by thousands of people of all ages and vehicles of every description and size to enter and leave the Enable Sports Centre. It is the only entrance and exit apart from a pedestrian one to the towpath. Sometimes the road becomes blocked so that an ambulance could not get through and should there be a flood, exit from the sports centre would be more than difficult. The houses have concealed drives. <i>No department in Wandsworth appears willing to take responsibility even for sweeping this part of the road. Please could there be a policy which would ensure an owner take action where public safety is concerned in a case like this?</i></p>
Heather Mathew, Richmond Council for Voluntary Service (CVS)	Place-based Strategy for Barnes	<p>[See comment in relation to the place-based strategy for Barnes]</p>
	Policies	
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General - Policies	<p>Section 15 in the un-headed list of contents – titled ‘Policies’ - doesn’t contain anything other than one photograph. Instead, the polices are set out in Sections 4 and 16 to 26 inclusive. Needs remedying.</p>

Peter Willan and Paul Velluet, Old Deer Park Working Group	General - Policies	Section 15 in the un-headed list of contents – titled ‘Policies’ - doesn't contain anything other than one photograph. Instead, the polices are set out in Sections 4 and 16 to 26 inclusive. Needs remedying.
	Responding to the climate emergency and taking action	
Clare Snowdon	16 Responding to the climate emergency and taking action	16. I wholeheartedly support putting climate change at the heart of decision making. It is good to see firm levels to minimise emissions. Possibly I would prefer stronger requirements around the circular economy - moving towards having organisations adopt doughnut economics or similar decision-making processes. I worry about the policy in practice and whether it is sufficiently robust, having seen policies such as biodiversity net gain in practice.
Juliet Ames-Lewis, The Richmond Charities	Policies 3 & 4 in Climate Change Section	Policy 3 - Tackling the climate emergency and Policy 4 - Minimising greenhouse gas emissions and promoting energy efficiency. The Richmond Charities almshouses are, in the main, listed buildings in conservation areas. Fuel poverty is a key issue for our elderly residents of limited means and the charity undertook a large scale energy audit in 2019 which identified the installation of photovoltaic panels as the most appropriate renewable energy source for the almshouses, in order to pass the benefits of cheaper electricity directly to our residents. However, the Council has refused permission for the charity to install photovoltaic panels on the majority of its almshouse estates. There are huge barriers for organisations and housing providers to 'go green'. If the aim as stated in Policy 3 is for all buildings to be net-zero carbon by 2050, then planning policy needs to change to enable renewable energy sources to be installed on listed buildings and in conservation areas. There is a balance between climate change and heritage assets but if the Council has declared a 'climate emergency', then the balance has to shift towards the environment and away from the heritage assets. The Richmond Charities will always have a duty of care to its listed buildings, but it also has a duty of care to its residents to ensure that they are not in fuel poverty. There needs to be help for home owners and housing providers in terms of removing barriers for planning permission for renewable energy sources.
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policies 3-7	RBGK welcome policies 3-7 that seek to address the climate emergency, minimise greenhouse gas emissions, and promote energy efficiency. This largely aligns with RBGK's own sustainability initiatives and commitments. However, RBGK seek a number of clarifications and have some observations. RBGK adheres to its own rigorous sustainability targets, which mark a step change to tackle the climate and biodiversity crisis by reducing our carbon footprint, with the overarching aim of becoming ‘Climate Positive’ by 2030. This involves an extensive range of site wide initiatives that RBGK hope will introduce very significant benefits and a permanent change to its operations. These initiatives will not always be delivered alongside other developments; they may be stand-alone projects. Alternatively, measures implemented they may bridge several projects. Therefore, due to the nature of how projects are carried out across the 330-acre site, the related benefits may not be captured as part of individual planning application submissions, which would still be required to be justified in line with LBRuT polices. This means that it will not always be feasible for net zero carbon to be achieved or demonstrated for individual developments. RBGK, therefore, suggest that in cases such as ours where there is a Council endorsed and/or recognised strategic plan in place, some degree of flexibility is allowed to take into consideration the wider picture; as well as the additional potential complexities associated with retrofitting sensitive heritage assets (e.g. where securing efficiencies may be a more prudent approach), as recognised in Part F of Policy 29.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Climate Change Emergency.	We welcome the increased emphasis given to climate change and pollution.
Peter Willan and Paul Velluet, Old Deer Park Working Group	Climate Change Emergency.	We welcome the increased emphasis given to climate change and pollution.
Katie Parsons, Historic England	Responding to the climate change emergency and taking action	Historic England recognises the urgent need for positive action to tackle climate change and is committed to achieving net zero. To meet the government’s target of being carbon neutral by 2050, we must recycle, reuse and responsibly adapt our historic buildings. Optimising embodied carbon by the reuse, maintenance, and retrofit of existing buildings is essential, as is avoiding maladaptation which can cause increased emissions, inefficiencies contributing to fuel poverty, and risk public health. We are pleased that this is recognised in policies 28 and 29. It would be helpful if the plan provided further detail on how climate change measures can be applied to historic buildings to ensure well informed retrofits that genuinely reduce carbon emissions. For example, encourage applicants to use a fabric first approach, and to demonstrate that they understand the building and where the inefficiencies lie so that the most effective measures can be installed. We are happy to provide further guidance as needed. At Historic England, we are researching and promoting the role our cultural heritage can play in both climate change mitigation and adaptation for example looking at recycling and reusing existing historic buildings . Historic England’s Heritage Counts: Carbon in the Historic Environment research shows that sympathetically upgrading and reusing existing buildings, rather than demolishing and building new can reduce carbon. Historic England’s 2020 Heritage Counts research Know Your Home, Know Your Carbon: Reducing Carbon Emissions in Traditional Homes highlights the difference repair and maintenance can make, the power of small behaviour changes and the need for careful planning when thinking about retrofits and renovations. Understanding Carbon in the Historic Environment is a report which builds on our 2019 Heritage Counts research, utilising modelled life cycle assessments and real-world data to estimate the whole life carbon emissions associated with the refurbishment and retrofit of different domestic homes. These are compared against a modelled scenario of demolishing existing homes and replacing them with new buildings. The 2020 Addendum to the initial research includes three new case studies. Locally based solutions, that are informed by local hazards and conditions, will be needed. This includes considering building materials and potential local energy/ heating options. Energy-generation switching will be the largest achievement in the pursuit of net zero and this will depend on local solutions such as heat networks, geothermal, wind, solar etc. (rather than looking at this on a property by property basis the benefits of approaching this on an area by area basis may produce better efficiencies. Historic England has produced a number of other resources aimed at providing practical advice on saving energy in homes which you may also find helpful for your evidence base. We welcome a set strategic of policies aimed at addressing climate change. We support the emphasis upon the circular economy and reuse which reflects the London Plan’s guidance and will retention of historic buildings, as well as existing materials. It would be helpful if the plan made reference to the risks posed by maladaptation which jeopardises not only historic buildings but can frustrate the ability of proposals to genuinely reduce carbon. A focus on areabased solutions might also be helpful, alongside planning for retrofit on a building by building basis. For example, can options to explore alternative energy sources for groups of buildings be pursued e.g. shared ground source heat pumps.
Joan Gibson	Page 144 (definitions)	For low carbon energy - need to band biomass boilers - should only be electric or heat source. Page 144.
Vicky Phillips, Habitats & Heritage	Climate Emergency	We strongly support the approach outlined in Policy 3 and subsidiary policies 4-9.
George Goodby, Environment Agency	Sustainability Appraisal and Sequential Test Report	[See comment on the Sustainability Appraisal in relation to climate change, flood risk, green and blue infrastructure]

	Policy 3.Tackling the climate emergency (Strategic Policy)	
Tim Catchpole, Mortlake with East Sheen Society	Policy 3.Tackling the climate emergency (Strategic Policy)	Mention could be made of developing plans for centrally sponsored decentralised energy networks (DENS) using ground source or borehole source heat exchangers from under sports pitches and similar open spaces. Item B7 could include minimising run-off and promoting soakaways, also aquifer use.
Vicky Phillips, Habitats & Heritage	Policy 3.Tackling the climate emergency (Strategic Policy)	Policy 3 A – We think it will be necessary to move towards net-zero carbon developments much more quickly than by 2050. Planning control over new development is one of the main levers the local authority has to reduce CO2 from buildings. The Local Plan Strategic vision of “a net zero borough by 2050” (p14) will require some sectors of activity to reach net zero much more quickly to compensate for those areas where the Council has less control e.g. the state of the existing housing and commercial building stock which is responsible for almost three quarters of the Borough’s CO2 emissions. Policy 3B para 11 and Policy 3D, also para 16.6 – We are pleased that the need to increase the energy efficiency of the existing building stock is acknowledged. In our work on our energy efficiency project SWLEAP we see many homes that are extremely energy inefficient, damp, mouldy and cold causing health problems to their occupiers. Existing programmes such as the Green Homes grants (25 properties to date) reach only a tiny proportion of these properties. The Carbon Offset Fund is welcome but is very small in financial terms and currently makes no contribution to any retrofitting other than at Council premises. Housing association blocks owned by RHP are often in need of complete refurbishment to bring them up to modern standards. We would like to see a fuller discussion of whether the Council considers it can do anything to advance this policy using planning powers and what national changes are needed to promote such action. This might include allowing solar panels to be fitted with no planning consent unless on a listed building and ensuring when refurbishment involving any planning consent is carried out the Council can mandate fitting air source heat pumps, extra insulation, triple glazing etc.
George Goodby, Environment Agency	Policy 3 ‘Tackling the climate emergency (Strategic Policy)	We recommend that Policy 3 Part B adds ‘ <i>maintaining flood storage and increasing it where possible</i> ’ to the numbered list. As mentioned previously, managing flood risk should be a key part of Richmond’s strategy for tackling the climate emergency. Protecting existing flood storage will ensure the issue isn’t exacerbated and seeking additional storage will help provide betterment and reduce flood risk in the borough. Recently, we have spent considerable time influencing development management applications where applicants try to demonstrate that a small loss of storage on their site is not a detriment to flood risk. We have highlighted that even small losses in storage can cumulatively have a large impact on flood risk. By specifically mentioning storage we believe this will help us persuade developers more easily on the importance of ensuring that there is no loss of flood storage because of their development, therefore bringing their proposals in line with the NPPF Paragraph 159 which requires ‘no increase in flood risk elsewhere’. This could be added to Part B7 where it could read ‘ <i>adopt an integrated approach to water management which considers flood risk and flood storage, sustainable drainage, water efficiency, water quality and biodiversity</i> ’. Recommended action: We recommend that you add ‘maintaining flood storage and increasing it where possible’ to Policy 3 Part B7.
George Goodby, Environment Agency	Policy 3 - Tackling the climate emergency (Strategic Policy)	The climate emergency and biodiversity crisis are intrinsically linked; climate change is one of the main drivers for biodiversity loss, and the destruction of ecosystems undermines nature’s ability to regulate greenhouse gas. However, biodiversity is only mentioned once in this policy. We would recommend that the link between the biodiversity and climate crises is expanded upon. This is also an appropriate place in the plan to link to the net gain policy set out in Policy 39: Biodiversity and Geodiversity .
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 3.Tackling the climate emergency (Strategic Policy)	We support the policy. The NHS is committed to reaching net zero carbon by 2040 for the emissions it controls. The report ‘Delivering a Net Zero National Health Service’ (October 2020) sets out interventions which will help the NHS decarbonise, including action to reduce emissions from the NHS estate, a move towards a sustainable model of healthcare with care closer to home, promoting less polluting travel options and preventing ill health which reduces hospital admissions. To support the net zero ambition, each NHS trust and integrated care system will have a Green Plan which sets out their aims, objectives, and delivery plans for carbon reduction.
	Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy)	
Neil Henderson, Gerald Eve on behalf of Reselton Properties	Policy 4 Minimising Greenhouse gas emissions and promoting energy efficiency	Policy 4, Table 16.1 - Reselton fully support measures to minimise greenhouse gases and promote energy efficiency. However, collectively with the Mayors carbon off set payment, the proposed carbon offset of £300/t would equate to a payment nearly 4 times the current value. While technology is still evolving to meet these ambitious enviromental targets, the carbon offset payment is more likely to be required intially. With such a high tarrif increase, this may render many schemes unviable, particularly where there is an ambition to meet other priorities such affordable housing. It is therefore suggested that, where it can be demonstrated that a payment in lieu is required, there should be discretion in the policy to allow this payment to be directed to other priorities in the Development Plan where it is considered appropriate to do so.
Tim Catchpole, Mortlake with East Sheen Society	Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy)	Item B2 could include DENS using heat from ground source and borehole source heat exchangers.
James Stevens, Home Builders Federation (HBF)	Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy)	Part A requires that all developments, including minor developments, are zero carbon. The London Plan stipulates that only major developments achieve this standard. This is because the Mayor of London needs to encourage the much greater supply of housing from small sites in order to achieve the housing requirement overall for London. The London Plan has made this a strategic priority. The Council justifies its departure from the position in the London Plan on the basis that cumulatively, small developments would amount to a large development within the borough (para. 16.12). This is a specious argument. Cumulatively, the small sites target contained in the London Plan, would also could amount to large development (12,000 homes per year on small sites compared to 40,000 per year on large sites) yet the Mayor of London has acknowledged the importance of encouraging small site delivery and wishes to support this more, hence the exemption for minor development. Richmond Council has a very small housing target relative to other London boroughs - a target of only 411 homes a year. It is the second lowest, after the City of London. A small part of Richmond’s housing supply in the next decade could come forward in the form of minor developments – that is developments of nine or fewer dwellings. Conversely, it has a very large and aging housing stock, which is highly energy inefficient, but also protected by conservation areas (they cover some two thirds of the borough). This historic environment protection prevents the gradual replacement of these leaky homes. The contribution to carbon emissions, therefore, from new homes built on small sites compared to the existing housing stock is negligible. This is doubly the case when new homes on minor developments will have to be built to the higher energy efficiency requirements of the new Part L of the Building Regulations (a 30% improvement on current Part L, moving toward zero carbon by 2030) that comes into force from June this year. We consider the Council’s approach is disproportionate when balanced against other policy priorities such as encouraging housing supply on small sites. As paragraph 4.2.1 of the London Plan states <i>For London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small sites is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.</i> (Emphasis retained from the London Plan). In line with the London Plan, the Council needs to encourage a far higher supply of housing on small sites. The London Plan has calculated that some 57% of its overall supply is expected to come forward on small sites of 0.25 hectares in size, although we recognise that some of this anticipated supply will be on sites greater than 10 or more dwellings. Nevertheless, the Mayor wishes to

		increase the rate of small site delivery and for permissions to be given faster through various policy interventions. This is a strategic priority for the London Plan. Requiring minor developments to be zero carbon from the date of the adoption of the local plan would militate against this strategic priority.
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policies 4, 5 and 6	Aside from this [See comment in relation to Policy 3-7], clarification is sought as to whether the requirements set out in policies 4 and 5 which refer to "non-residential development of over 500sqm" includes conversions and refurbishments (including for listed buildings), or whether this is only applicable to new build floorspace. Similarly, clarification is sought as to whether the requirements set out in policy 6 for "development of 100sqm or more of non-residential floorspace" includes conversions and refurbishments, or whether this relates to new build floorspace only. RBGK's view is that these policies may generally be more applicable and deliverable in relation to new build development. Part (E) of Policy 4 encourages development proposals to achieve zero-carbon on-site insofar as possible, rather than relying on offset payments to make up any shortfall in emissions. The policy recognises that, where cash-in-lieu contributions are acceptable, this will be offset at a rate of £300/t as of 2021, and this will be regularly reviewed. RBGK note that the policy wording stipulates a blanket rate and does not provide any flexibility or exemption for charities and cultural institutions. Given that RBGK applies its own rigorous site-wide sustainability targets, and this is not always able to be reflected in individual planning applications (as noted above), RBGK requests that this is considered in future draft policy. RBGK also highlight that there is a slight conflict in Policy 4. Part D requires non-residential development of 500sqm or more to achieve net-zero carbon with a minimum of 60% on-site reduction. However, Table 16.1 specifies that non-residential development of 500sqm or more should achieve net-zero with a minimum of 50% on-site reduction. RBGK seek clarification in the on-site reduction figure.
Nina Miles, GLA on behalf of Mayor of London	Climate Change and Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy)	The Mayor welcomes the elevation of the importance of tackling climate change across the borough within Richmond’s Plan. The Mayor has set an ambitious aim for London to be a zero carbon city by 2030 and you may want to reflect this in the strategic climate emergency policy. With regards to the ambitious targets in set out in Policy 4 that seek a higher level of on-site reduction in carbon (60%) and a higher offset rate of £300/t compared with Policy SI 2 LP2021, it will be important to ensure that these are deliverable and that housing targets and other requirements of the plan can still be achieved. Policy DF1 LP2021 applies priority to affordable housing and necessary public transport improvements when setting policies seeking planning obligations in Local Plans. Policy 4 should be reviewed once the Whole Plan Viability evidence, has been produced. . For clarity, the supporting text to Policy 4 in paragraph 16.8 should read ‘at least five years’ rather than ‘over a period of 4 years’ as per the Mayor’s BeSeen energy monitoring guidance.
Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 4 - Minimising greenhouse gas emissions and promoting energy efficiency	We welcome the Council’s aspirations to achieve a borough target of net-zero carbon by 2050 and we support the requirement for proposed development to demonstrate a contribution to minimise greenhouse gas emissions on development sites. We do however query the need to meet burdensome policy requirements over and above London Plan policy without evidence-based justification. In particular, draft Policy 4 seeks to achieve a minimum of a 60% on-site carbon reduction for any new build residential development, major development of 10 or more dwellings and non-residential development of 500sqm or more. This is considerably higher than London Plan (2021) Policy SI 2 requirements, which requires a minimum of 35% and is regarded as unreasonable. It is not clear from supporting text or evidence-based information as to why the target has been set at a level significantly higher than that within the London Plan (2021) nor has there been a review as to the realities of sites being able to deliver this target. The government plans to bring in a more gradual approach (as per the Future Homes Standard (2021)) to increasing savings by way of an interim Part L in 2022, which is of similar level to the London Plan (2021) 35% minimum target. This gradual approach is more sensitive to the abilities of the industry to adapt and deliver these increasingly demanding targets and is based upon detailed studies and extensive consultation. The Council’s 60% target therefore does not align with the Future Homes Standard approach and is not justified by the relevant studies. Draft Policy 4 highlights that the London Plan carbon offset price is currently set at £95/t. The Council note that this is generally considered too low to actually deliver equivalent carbon savings and therefore does not incentivise sufficient on-site savings. The Council note that in order to incentivise developers to implement on-site lower carbon strategies where possible, and to ensure that any remaining carbon shortfall can adequately be addressed off site, the carbon shortfall for the assumed life of a development will therefore be offset at a rate of £300/t. The Council have provided no evidence-based reasoning as to how they have arrived at this conclusion nor the appropriateness of the proposed figure. A significant increase in carbon offset price will fail to encourage on-site reductions and simply be prohibitive to the redevelopment of sites as a whole, including the delivery of on-site affordable housing. London Plan (2021) guidance notes that the price for offsetting carbon and suggested carbon offset price will be updated in future guidance by the Greater London Authority (GLA). It is therefore also queried whether the Council have liaised with the GLA regarding the updated figure to ensure alignment. The London Plan (2021) has provided gas emission and energy targets which do not jeopardise the strategic aims for London including housing delivery. In its current form the burdensome nature of these policies without justification would significantly affect the deliverability of residential schemes, including the viability of small housing sites, thereby impeding the council from meeting borough housing targets and the deliverability of affordable homes.
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy)	We support the policy. It is recognised that delivering a net zero health service will require work to ensure new healthcare buildings are net zero compatible, as well as improvements to the existing estate. We note that London Plan Policy SI2 requires major development to be net zero carbon which now applies to residential development and non-residential development. It should be noted that for the redevelopment of NHS sites this requirement can add significant costs. New health estate projects and major refurbishment projects are assessed by the BREEAM rating system. We note that London Plan paragraph 9.2.7 helpfully states that the BREEAM system can be used to can help demonstrate that energy efficiency targets have been met and Boroughs are encouraged to include BREEAM targets in their Local Plans.
Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency	Policy 4, as currently drafted, is not in accordance with national policy, not in general conformity with the London Plan, nor justified. We recommend that it is amended to fully conform with the London Plan which would make it sound, as explained below: Explanation London Plan Policy SI 2 ‘Minimising greenhouse gas emissions’ sets a carbon cash-in-lieu payment of £95/t, which is based on a nationally recognised non-traded price, that has been tested as part of the viability assessment for the London Plan which boroughs may use to collect offset payments. The Greater London Authority guidance for London’s Local Planning Authorities on establishing carbon offset funds (October 2018) requires that “LPAs should develop and publish a price for offsetting carbon based on either: a nationally recognised carbon pricing mechanism; or the cost of offsetting carbon emissions across the LPA. The price set should not put an unreasonable burden on development and must enable schemes to remain viable. ” The London Plan carbon offset price of £95 per tonne has been tested as part of the viability assessment (of the London Plan). This is intended to be the price LPAs adopt. Where following a ‘cost of offsetting’ route, the LPA should include an assessment of the carbon offsetting measures that are possible in the LPA, and dividing the average cost per tonne per year of these measures by the expected shortfall in emissions from the anticipated development coming forward over the next 30 years. An evidence base for the £300/t figure has not been provided (an ‘Evidence Base for Carbon Emissions Reduction Policies’ was provided in 2008). Based on recent referable developments, carbon offset payments at the London Plan 2021 rate (£95/t) equates to an average offset payment of c. £20/sqm. With the proposed £300/t rate this would equate to c. £65/sqm. As a worked example, on a development of 20,000 sqm it is estimated that this would be an additional £1million which will greatly affect a development’s viability. Policy 4 is based on a baseline of Approved Document Part L 2013 emissions, which will become superseded by National Policy changes to Approved Document Part L 2021, that addresses carbon emissions via a 31% betterment over Part L 2013 (domestic), and Approved Document Part L 2025 under the Future Homes Standard which will go even further to deliver an estimated 75% betterment over Part L 2013 (domestic). This will effectively surpass the proposed target of 60% for major developments, but allows for a gradual transitional period for the Construction Industry

		<p>to adjust. Furthermore, the GLA are due to release a revised Energy Assessment Guidance (2022) to compliment the newly published Approved Document Part L 2021, which will address the improved carbon reduction target and how this should be assessed on schemes within London going forward.</p> <p>National Planning Policy and London Plan both encourage maximising renewable provision, including solar PV, but do not set specific targets, as they recognise site and roof space constraints. By adhering to a robust review process in planning, this allows greater design flexibility than setting rigid targets.</p> <p>Recommended Amendments</p> <p>In lieu of an appropriate evidence base for the £300/t offset figure, it is recommended that the GLA viability tested £95/t figure be kept, in accordance with the London Plan 2021.</p> <p>With the continual carbon reduction targets being imposed under the Future Homes Standard (31% under ADL 2021, and 75% under ADL 2025), and the anticipated update to the GLA Energy Assessment Guidance (2022), it is recommended that the Policy targets be amended to track London Plan 2021 targets, which shall develop in-sync with the Future Homes/Buildings Standard.</p> <p>It is recommended that mandatory solar technologies target of 40% of the building footprint area be dropped, and the guidance in the London Plan 2021 and the anticipated Energy Assessment Guidance (2022) be adopted.</p>
	Policy 5. Energy Infrastructure (Strategic Policy)	
Tim Catchpole, Mortlake with East Sheen Society	Policy 5. Energy Infrastructure (Strategic Policy	Item B could be modified by adding after “Where networks do not exist, developments should make provision to connect to any future network” the following: “and contribute significantly to its inception within 5 years or by 2030.”
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 5	[See comment regarding the non-residential threshold]
	Policy 6. Sustainable Construction Standards	
Tim Catchpole, Mortlake with East Sheen Society	Policy 6. Sustainable Construction Standards	<p>Water Efficiency</p> <p>Para 16.37 about “water stressed” does not square with the observation that the water levels in the major Chalk aquifer under London are rising well above the Victorian era lows caused by over extraction. This aquifer must now be considered a significant water resource for balancing high versus low rainfall years. Of course, the requirement for high standards of water efficiency in new developments should remain.</p>
James Stevens, Home Builders Federation (HBF)	Policy 6. Sustainable construction standards	<p>Part A states:</p> <p>A. Developments will be required to achieve the highest standards of sustainable design and construction.</p> <p>The policy then sets out requirements for residential development that go further than the London Plan and the national Building Regulations especially a requirement to achieve a four-star rating (as a minimum) under the BRE Home Quality Mark scheme.</p> <p>This is a disproportionate position and one that places a significant barrier to smaller developers attempting to deliver minor developments. We advise the Council to not make additional policy in this area, and adhere to policies in the London Plan plus any new requirements introduced via changes to the Building Regulations.</p>
Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 6 - Sustainable Construction Standards	<p>We welcome the Council’s commitment to secure the highest standards of sustainable design and construction as outlined under draft Policy 6. However, we consider that these are unduly onerous and costly. In particular, the rigid application of this policy (as worded) will likely deter SMEs from locating to the borough (due to the high fit out costs) as well as future development and investment in the borough, as it becomes unviable to deliver new commercial schemes.</p> <p>It is our opinion that achieving a BREEAM ‘Outstanding’ rating for the commercial elements will have a negative impact on economic growth and job creation and therefore be contrary to the Council’s strategic vision. It is also unusual both within and outside of London boroughs to require an ‘Outstanding’ rating. The BRE define an Outstanding rating as one appropriate for an ‘innovator’ building and represents less than 1% of UK non-domestic buildings. We think it is more appropriate to target an Excellent rating, defined by the BRE as ‘best practice’ covering 10% of the UK’s non-domestic buildings. In addition, achieving any BREEAM rating is over and above the requirements of the London Plan and the Council’s evidence base has failed to justify why a high rating is required in Richmond.</p>
Councillor Richard Warren	Policy 6. Sustainable Construction Standards.	<p>We really ought to encourage prefabrication/modular construction because that would speed-up the construction process and reduce pollution and disruption, with fewer lorry trips needed and less noise and dust generated by building work. Owing to the precision of pre-fabrication, modern modular buildings tend to have high levels of insulation, so are more energy efficient than traditionally built homes, and fewer snagging problems.</p> <p>I would like to have the following wording included, please: “Developers will be encouraged to use modular assembly methods (pre-fabrication) at their development sites. Developers that want to use other, non-modular construction methods would need to present compelling environmental reasons for doing so.”</p> <p>Modular construction is commonplace in Austria and Germany.</p> <p>Modular construction is suitable for sites large and small. Croydon is home to the world’s tallest modular tower: 101 George Street comprises two towers, one of 44-storeys and the other 38-storeys. Together they contain 546 build-to-rent apartments. https://www.hta.co.uk/project/101-george-street</p> <p>Modular construction is also suitable for small projects. In Cambridge, six modular homes were created for rough sleepers two years ago: https://www.bigissue.com/latest/micro-homes-for-cambridge-rough-sleepers-built-by-formerly-homeless-people/</p> <p>In addition to brand new developments, factory-made units can be added to existing period architecture, which has been the case in St John’s Wood, where several Victorian mansion blocks have had rooftop extensions craned onto them and fully assembled and connected with the rest of the building within two weeks.</p> <p>If Croydon, Cambridge and St John’s Wood can embrace the future, then I believe we can too. Indeed, I believe our borough’s residents would welcome reduced pollution, dust and disruption during a speeded-up on-site construction process and the subsequent availability of well-insulated, sustainably built homes.</p>
Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 6 Sustainable Construction Standards	<p>Policy 6, as currently drafted, is not in accordance with national policy, not in general conformity with the London Plan, nor justified. We explain this and set out recommended amendments to make the policy sound, below:</p> <p>Explanation</p> <p>There is a considerable deviation from National Planning Policy and from the London Plan, neither of which require BREEAM or the voluntary Home Quality Mark standard. Key BREEAM credit philosophy has been embedded into the London Plan 2021 without specifically requiring certification, allowing greater design freedom. Home Quality Mark is a voluntary scheme, which was established so that house builders and developers could distinguish their properties and sustainability credentials.</p> <p>Mandating it will diminish this intent.</p> <p>Policy does not take into consideration practical implications to ‘Shell Only’ and ‘Shell & Core’ BREEAM Assessments, which are considerably harder to achieve credits for due to the reduced number of available credits, therefore reducing design flexibility. Site constraints often make ‘Outstanding’ onerous to achieve, regardless of the Development design quality. This is particularly true for ‘Shell Only’ assessments where the scope only covers capped services. These assessments are likely to require an upgraded scope of works so that core services are fitted to enable improvements in efficiency. This will require efficient core services and renewable technology dedicated solely to the commercial areas.</p>

		<p>BREEAM ‘Outstanding’ is a considerable uplift to the more common ‘Excellent’ rating, which requires BREEAM Assessor input from RIBA 0 which is often prior to consultant appointments. A BRE briefing paper ‘The value of BREEAM’ estimates an uplift in capital cost of 10% for retail and office building types. It is necessary that all pre-planning credits are targeted where possible and this will put additional pressure on planning stage budgets.</p> <p>Key BREEAM Outstanding credits are often achieved on non-BREEAM Developments. BREEAM Outstanding represents a 66% carbon reduction over building regulations, which will be met from the Approved Document Part L 2021 and Approved Document Part L 2025 under the Future Homes Standard, in addition to the adoption of all-electric energy strategies. The Circular Economy and WLC requirements of London Plan 2021 surpass those of BREEAM Outstanding, successfully reducing waste, embodied carbon, and encouraging sustainable procurement methods. The London Plan also requires futureproofing through dynamic thermal overheating assessments following CIBSE TM52/59, and the prediction of operational energy performance through CIBSE TM54 which goes beyond the requirements of BREEAM Outstanding.</p> <p>Approved Document Part L 2021 does not stipulate a specific FEES kWh/m2/yr target, but is instead informed by the Notional Building as defined by the SAP and SBEM methodologies. The targets under Policy 6 align closely with the London Energy Transformation Initiate (LETI) which is a voluntary standard and onerous to achieve.</p> <p>Recommended Amendments</p> <p>London Plan 2021 targets BREEAM minimum performance for selected key credit criteria, such as energy and water, and surpasses BREEAM Outstanding for other key areas, such as the reduction in carbon emissions and prediction of operational energy performance, reduction in water consumption, embodied carbon benchmarks via Whole Life Cycle Carbon assessments, and the reduction of demolition and construction waste via Circular Economy Statement. It is therefore recommended that London Plan 2021 policies be targeted which shall cover the key BREEAM credits.</p> <p>The Fabric Energy Efficiency Targets should be based on Building Regulation compliance in accordance with Approved Document Part L 2021 and the 2025 Future Homes Standard iteration, as this will be variable based on the design and Notional specifications used under the SAP and SBEM methodologies.</p>
David Wilson, Thames Water	Policy 6. Water Efficiency/Climate Change	<p>The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.</p> <p>Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link: https://www.thameswater.co.uk/Be-water-smart</p> <p>We support the water efficiency comments in Policy 6, but it is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Proposed policy text:</p> <p><i>“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”</i></p>
Jon Rowles	Policy 6. Sustainable Construction Standards	<p>The council is relying upon BREEM standards and not Passivhaus (which was at one point was in the national LibDem manifesto).</p> <p>The Council is trying to deliver a large part of its housing targets by an intensification of town centres. However, many of these areas are under stress and are not have the proper infrastructure for the existing residents. For example, one service road behind Whitton High Street just has hardcore with no drains or street lighting. All town centres are suffering from poor refuse bin management where service yards have been lost to shop extensions leaving no space to store rubbish.</p>
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 6	[See comment regarding the non-residential threshold]
	Policy 7. Waste and the circular economy (Strategic Policy)	
Heather Mathew, Richmond Council for Voluntary Service (CVS)	Paragraph 2.38 (related to Policy 7)	<p>2.38 Food waste – one of the things that the pandemic has highlighted is the availability of surplus food from retailers and the work of community groups such as the Real Junk Food project in St Margaret’s to use and distribute for community benefit (Bellies not bins). However much of the distribution involves multiple vehicle journeys around the borough, contributing to emissions etc. It would be useful to reference use of surplus food and think through where does this sit in plans for infrastructure.</p>
Nina Miles, GLA on behalf of Mayor of London	Policy 7. Waste and the circular economy (Strategic Policy)	<p>The Mayor welcomes the requirement in Policy 7 for Whole Life-Cycle Carbon Assessments. These should be carried out in accordance with the Mayor’s Whole Life-Cycle Carbon Assessments guidance and that should be referenced within the supporting text.</p> <p>Waste</p> <p>London Plan Policy SI 8 Part B3 requires boroughs to allocate sufficient land (sites and/or areas) and identify waste management facilities to provide the capacity to manage their apportioned tonnages of waste. Where apportionments are pooled, boroughs must demonstrate how their joint apportionment targets will be met, for example through joint waste Development Plan Documents.</p> <p>We welcome Policy 7 that seeks to safeguard Richmond’s existing waste sites and that the policies of the West London Waste Plan 2015 and London Plan will be used to assess proposals affecting existing waste management sites or for additional waste management facilities. We note that the WLWP is due for review in 2031 and it should be made clear within the Plan that the waste apportionment over the lifetime of the plan will be accounted for</p>
George Goodby, Environment Agency	Policy 7. Waste and the circular economy (strategic policy)	<p>Section A, point 3: Where rivers are used to transport construction materials and waste, the protection of the river ecosystem is of paramount importance. Please include a requirement for a Construction Environment Management Plan (CEMP) for all development using the river to transport construction materials and waste. The CEMP should demonstrate how the river will be protected during the transportation of construction materials and waste.</p>
George Goodby, Environment Agency	Policy 7. Waste and the circular economy (Strategic Policy) – General comments in relation to Waste Management	<p>Local waste management activities that are poorly run can pollute the environment, cause harm to human health and generate nuisance impacts for local communities. Illegal waste activity can blight local areas as well as polluting the environment and causing harm to human health. Waste planning has a role to play in delivering objectives including reducing greenhouse gas emissions, the better management of resources and protecting the environment. Waste management facilities have the potential to pollute the environment through emissions to air, releases to ground and surface water and leaving a legacy of contaminated land. Waste Local Plans can help prevent this by making sure that sites for waste facilities are located and designed to minimise their impact.</p>

		Effective planning for waste infrastructure needs to reflect the needs of neighbouring authorities, or further afield in the case of some waste streams such as hazardous waste or other specialist waste streams.
Tim Catchpole, Mortlake with East Sheen Society	Policy 7. Waste and the circular economy (Strategic Policy)	No comment.
Philip Villars, WSP on behalf of Sharpe Refinery Service Limited	Place Based Strategy for Twickenham, Strawberry Hill and St Margarets Policy 7	<p>We have broadly set out our comments in relation to the place based strategy above. We do not find the approach to this policy to meet the requirements of Section 3 of the NPPF. The policy has failed to consider sites such as Arlington Works which could significantly contribute to the aims of the place based strategy and deliver the identified much needed homes and commercial floorspace within the London Borough of Richmond.</p> <p>Policy 7, Part B states that the borough's waste sites are safeguarded and that the evidence which underpins this policy is the West London Waste Plan (2015) and an unreferenced version of the London Plan. Firstly this policy should be based upon an up to date evidence base and not one that is over seven years old. Secondly to be sound this policy should refer to a referenced version of the London Plan. At present this policy does not meet the requirements of Section 3 of the NPPF.</p> <p>In relation to Policy 7, we consider the following to be necessary:</p> <ul style="list-style-type: none">- In accordance with paragraph 21 of the NPPF this policy should be clear as to whether it is strategic;- In accordance with paragraph 31 of the NPPF, policies should be underpinned by relevant and up to date evidence. Policy 7 is relying upon evidence from the out of date West London Waste Plan (2015). The evidence base is out of date as it over seven years old. Paragraph 31 also goes on to state that the evidence should also take into account relevant market signals which Policy 7 does not. Policy 7 will continue to safeguard a disused waste site, which is in direct conflict with Policy GG2 of the London Plan.
	Policy 8. Flood risk and sustainable drainage (Strategic Policy)	
Hilary Pereira, River Thames Society	Policy 8. Flood risk and sustainable drainage, riverside sites.	The place-based strategies demonstrate the importance of the river – all but Whitton and Heathfield (D) include at least one bank of the Thames. The riverside sites fingered for development are well-known, and for some like Twickenham Riverside the RTS has been engaged in extensive previous consultation. In general, the RTS is supportive of the overall principles and policies which are being proposed, just the local site-specific detail may at times be more problematic for us, as in the latest plans for Twickenham Riverside and the previous overdevelopment at the Mortlake brewery site. The RTS will continue to comment on specific planning applications, and is likely to continue to use in support the agreed policies and general principles from the Richmond and London plans. The RTS hopes it will be able to rely on the planners to insist on real exceptionality for any built development in MOL (including over Thames water-space) or within 16 meters of the bank of the tidal river.
Tim Catchpole, Mortlake with East Sheen Society	Policy 8. Flood risk and sustainable drainage (Strategic Policy)	<p>We urge that you include a policy stating that flood-risk areas are protected from storm surges and rising sea levels.</p> <p>Ideally there needs to be a pre-amble about this issue but you haven’t shown any such pre-ambls throughout the document, so it needs to be the opening paragraph of your supporting text, as follows:</p> <p>The major and most unpredictable flood risk in the Borough is from storm surges in the North Sea inundating the Thames Estuary. In February 1953 many lives were lost on Canvey Island and the flooding of Barnes, Mortlake and Richmond was severe. Recent research (2021) indicates that the levels could have been up to a metre higher at the Sheerness Tidal Observatory if the storm centre had moved at a slightly lower velocity. If a storm surge occurs in conjunction with spring high tides and heavy, persistent rainfall with high run-off and fluvial flooding then the Environment Agency’s worst case scenario would be exceeded by a metre or more. The Thames Barrier would be overwhelmed and much of London, the underground system and basements would be severely flooded with consequent loss of life and disruption. With rising sea-levels and more importantly more extreme weather provoked by climate warming, this scenario must be addressed and not swept under the carpet!</p> <p>In summary the Borough is at risk of flooding from six major factors in order:-</p> <ol style="list-style-type: none">1. Storm surges in the North Sea2. Tidal flooding3. Fluvial flooding4. Surface water run-off5. Groundwater6. Sewer capacity overflow <p>Without a new vastly improved Thames Barrier factor 1 is impossible to mitigate while factors 2 and 3 can be mitigated with higher flood defences. The other three factors are mainly very localised in effect and can be improved with coherent engineering works and maintenance, but they would all three probably exacerbate any major storm surge flooding.</p> <p>Table 16.3 Flood Zones</p> <p>A Zone 0 should be added with the same parameters as Zone 1 to take account of the extreme storm surge flooding.</p> <p>Sustainable drainage</p> <p>Item H.2.a. This should read 2 l/s per sq metre runoff rate.</p> <p>Table 16.4 Basements in areas of flood-risk</p> <p>Flood Zone 1 should be added to Flood Zone 2 and a Flood Zone 0 should be inserted in place of Flood Zone 1 with a note saying “If a basement, basement extension or conversion is acceptable in principle in terms of its location, it must have internal access to a higher floor, and flood resistant and resilient design techniques must be adopted.”</p>
Vicky Phillips, Habitats & Heritage	Policy 8. Flood risk and sustainable drainage (Strategic Policy) - Section 'Flood Defences' I & J	paras I and J – we think there should be some reference here to the Thames Landscape Strategy, including its work on flooding via the “Rewilding Arcadia” project.
George Goodby, Environment Agency	General comments in relation to Flood Risk	<p>As set out in Schedule 4 ‘Consultations before the grant of permission’ of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Environment Agency is a statutory consultee for development in the bed of or within 20 metres of a main river and for certain development in flood risk areas as defined in the Flood Risk Standing Advice (FRSA) guidance. The flood zones refer to fluvial and tidal flooding only and therefore the risks of any other flooding, for example surface water and ground water, should be discussed with the appropriate authority. We also recommend that you discuss any Emergency Planning matters, such as safe access and egress requirements, with the relevant team.</p> <p>We welcome your ambition set out in the draft Local Plan to go above and beyond the recommendations of national policy and guidance for managing flood risk, for example through using higher climate change allowances and requesting sites to deliver additional flood storage. Whilst these ambitions reflect your Climate Emergency declaration, we urge you to consider the practical implications of this. We would also recommend that the plan strongly emphasises the connection between tackling climate change and flood risk management.</p> <p>[See more detailed comments on flood risk]</p>
David Wilson, Thames Water	Policy 8 - Flood Risk & Sustainable Drainage	<p>In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". We therefore support the reference to seer flooding in Policy S8.</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to</p>

		<p>be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>Flood risk policies should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the London Plan drainage hierarchy (Policy SI 13). It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Policy wording or supporting text: <i>“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</i></p>
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy)’ Part A	<p>Please note that our comments are related to fluvial and tidal flood risk only.</p> <p>Part A of the policy states ‘<i>Unacceptable developments and land uses will be refused in line with national policy and guidance, the Council’s Strategic Flood Risk Assessment (SFRA) and as outlined in the table below.</i>’</p> <p>Applications will be refused against policy so it may be worthwhile differentiating between being refused against policy and the role of guidance such as the SFRA.</p> <p>Recommended action: clarify the role of policy and guidance.</p> <p>Part A states that ‘<i>all development should avoid, or minimise, contributing to all sources of flooding...</i>’.</p> <p>The term ‘<i>minimise</i>’ suggests that some increase in flood risk is acceptable. For fluvial and tidal flooding, this is contrary to NPPF which states that ‘<i>development should be made safe for its lifetime without increasing flood risk elsewhere</i>’. We strongly recommend this wording is altered.</p> <p>Recommended action: we strongly recommend reviewing the wording of this phrase.</p> <p>Whilst we support that Part A sets out the requirement for the Sequential Test and Exception Test, it fails to encourage a sequential approach to the layout of sites. For example, if a site is partially within Flood Zone 3 and Flood Zone 1, any development should be located within Flood Zone 1 <i>or</i> the most vulnerable uses should be located in Flood Zone 1 rather than Flood Zone 3.</p> <p>We strongly recommend including the requirement for a sequential approach to the layout of sites affected by flood risk within this policy, as outlined in Paragraph 162 of the NPPF.</p> <p>Recommended action: we strongly recommend including the requirement for a sequential approach within this policy.</p>
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part B	<p>Part B begins ‘<i>To enable development, proposals must provide mitigation and resilience against flood risk, taking advice from the Lead Local Flood Authority (LLFA) as appropriate, and provide appropriate compensation to existing flood risk levels and volumes</i>’.</p> <p>We would recommend moving reference to LLFA between ‘<i>to enable development, proposals must provide mitigation and resilience against flood risk</i>’...and ... ‘<i>provide appropriate compensation to existing flood risk levels and volumes</i>’. We would recommend that if you wish to reference taking advice from the LLFA then you should move this to the end of Part B. You should also reference seeking advice from the Environment Agency. By not including the Environment Agency here, applicants may infer that the policy only requires mitigation and resilience against surface water flood risk, which the LLFA is responsible for, and excludes the requirement from other sources of flooding, such as tidal and fluvial which the Environment Agency is responsible for.</p> <p>Recommended action: We strongly recommend that you include reference to the Environment Agency as well as the LLFA.</p>
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part B	<p>Part B states that ‘<i>...proposals must provide mitigation and resilience against flood risk...</i>’ however, it does not set out what appropriate mitigation and resilience measures would be for fluvial and tidal flooding. This would mostly relate to our finished floor level requirements which we have determined to be the most appropriate mitigation and resilience measures.</p> <p>For fluvial flooding, the finished floor levels for all developments of all vulnerability classifications must be set 300mm above the 1 in 100 plus appropriate climate change allowance flood level.</p> <p>For developments impacted by defended tidal flooding, as a minimum all sleeping accommodation must be located on finished floor levels above the Thames Tidal Breach 2100 flood level. We strongly recommend incorporating these requirements into the policy wording. This will ensure development is safe for its lifetime for future occupants as required in Paragraph 159 of the NPPF.</p> <p>If this is not possible, an alternative option would be perhaps adding this information to the supportive text or adding a footnote to the relevant section in the Level 1 SFRA where guidance is provided on this would be useful to applicants (Table 6-1. Planning Application and Development Requirements for All Developments (Flood Zones 1, 2, 3a and 3b)).</p> <p>Recommended action: include specific finished floor level requirements for developments in the fluvial and defended tidal floodplains within the policy wording.</p>
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part B	<p>Part B goes on to state ‘<i>...and provide appropriate compensation to existing flood risk levels and volumes, addressing the predicted 1 in 100 year Risk of Flooding from Surface Water (RoFSW) mapped depths as a minimum</i>’.</p> <p>Development must also ensure appropriate flood storage compensation is provided for the fluvial and undefended tidal floodplain. The undefended tidal floodplain is riverward of the flood defences.</p> <p>For the fluvial floodplain, any loss of flood storage within the fluvial 1 in 100 inclusive of climate change flood extent (for example through an increase in built footprint or change of ground levels) must be compensated for on a level-for-level and volume-for-volume basis. For the undefended tidal floodplain, to ensure there is no loss of flood storage there should be no increase in built footprint or raising of ground levels as level-for-level and volume-for-volume flood storage compensation is not achievable in this location. If water compatible structures, such as pontoons or slipways, are proposed, they should be designed to minimise the loss of flood storage i.e. by being floodable, hollow structures rather than concrete, solid structures.</p> <p>Recommended action: We strongly recommend that fluvial and undefended tidal flood storage compensation is referenced as well as surface water compensation. Please see our comments under Part D for further comments regarding flood storage compensation.</p> <p>[See comment under Part D for further comments regarding flood storage compensation]</p>
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part D	<p>Part D Part D states ‘<i>Where a Flood Risk Assessment is required, on-site attenuation to alleviate fluvial and/or surface water flooding over and above the Environment Agency’s floodplain compensation is required where feasible.</i>’</p> <p>We would recommend rewording this to distinguish between fluvial and pluvial flood mechanisms and mitigation requirements</p> <p>For example, for surface water flood risk alleviation, onsite attenuation for surface water management to mitigate increased runoff rates and volumes. For fluvial flood risk alleviation, on site floodplain compensation provided on a level-for-level and volume-for-volume basis. Furthermore, perhaps adding a footnote to the relevant section in the Level 1 SFRA where guidance is provided on this would be useful to applicants.</p> <p>Recommended action: We recommend you separate the surface water and fluvial flood risk requirements.</p>
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part D	<p>With regard to the wording ‘<i>Environment Agency’s floodplain compensation,</i>’ the requirement for floodplain compensation is not just an Environment Agency requirement. It is a stance adopted by the Local Planning Authority following our guidance to ensure that flood risk is not increased elsewhere in line with national policy. It is therefore a requirement of national and local policy and</p>

		<p>not just an Environment Agency ask. We strongly recommend rewording this aspect of the policy to not place ownership solely on the Environment Agency. The wording could be along the lines of</p> <p><i>‘...above and beyond the minimum fluvial and undefended tidal flood storage compensation requirements’ or ‘additional flood storage must be provided on top of ensuring no loss of fluvial and/or undefended tidal flood storage’.</i></p> <p>Recommended action: we recommend you review the wording <i>‘Environment Agency’s floodplain compensation’.</i></p>
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part D	<p>As currently written, Part D does not require additional compensation or attenuation. It states <i>‘over and above...where feasible.’</i> As written, this is open to interpretation and is not robust policy wording and therefore is unlikely to achieve any extra flood storage provision through the development management process. To make this robust it should be a requirement and written as <i>‘must provide additional volumes’ or ‘shall be provided’.</i> If this is not the intention, then an explanation should be provided to define ‘feasible’ and set criteria and process for determining if it must be provided e.g. when additional space allows on site then this <u>shall be</u> provided.</p> <p>One approach to this could be to potentially request a certain percentage increase in storage, or a percentage reduction of built footprint on sites, a similar approach to the 10% Biodiversity Net Gain requirements set out in the Environment Bill. The implications and practicalities of this would need to be clearly thought out before included in as a policy requirement.</p> <p>We would like to note that applicants often highlight that their sites’ constraints restrict the overprovision of storage and in our experience, they struggle to provide no loss of flood storage, let alone an overprovision. This may be due to the size of the plots or their chosen designs and viability assessments. Therefore, if the council truly seeks to secure additional flood storage provision, then strong policy wording must be implemented.</p> <p>If our above comments cannot be incorporated, then even in its current wording we welcome the encouragement of additional flood storage as it can aid discussions in persuading developers to consider an increase in flood storage, even if it cannot be used to mandate it.</p> <p>Recommended action: we recommend you review the policy requirements and wording for providing additional flood storage.</p> <p><i>Please note our comments relate to fluvial floodplain compensation and the undefended tidal floodplain only. Any surface water matters should be commented on by the Lead Local Flood Authority. Any safe access and egress matters should be discussed with the Local Planning Authority’s Emergency Planning Team.</i></p>
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part E	<p>Part E ‘Table 16.3 Flood Zones, Restrictions, and Requirements’ in Part E explains that in FZ3b, <i>‘Redevelopment of existing developed sites will only be supported if there is no intensification of the land use and a net flood risk reduction is proposed; any restoration of the functional floodplain will be supported.’</i></p> <p>Where it states <i>‘no intensification of the land use’</i> it would be useful to define ‘land use’. We understand that this should relate to built development and/ or vulnerability of development. Perhaps the wording should be updated to ‘no additional built development within undeveloped functional floodplain and no increase in vulnerability’ within land shown as FZ3b. This would then read something like: ‘Redevelopment of existing developed sites will only be supported if there is no additional built development proposed within undeveloped functional floodplain, no increase in vulnerability and a net flood risk reduction is proposed; any restoration of the functional floodplain will be supported’. This change should also be reflected in the supporting text in paragraph 16.62.</p> <p>Recommended action: update the wording to clarify what is meant by <i>‘no intensification of the land use’</i> in Flood Zone 3b.</p>
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part I and J - Flood Defences	<p>We welcome that this policy references the TE2100 Plan and the future defence maintenance, replacement and raising requirements.</p> <p>The future raising requirements of the flood defence levels in Richmond are as follows:</p> <ul style="list-style-type: none">• Raising of all defences along the Thames by up to 0.5m by 2065, and by an additional 0.5m by 2100;• Raising of defences on Eel Pie Island by up to 0.8m by 2065, and by an additional 0.5m by 2100. <p>This allows for projected increases in sea level to 2135.</p> <p>We also have the following comments on the wording of Parts I & J of this policy:</p> <p>Part I 3 states <i>‘Unless exceptional circumstances are demonstrated for not doing so, development should be set back from riverbanks and existing flood defence infrastructure to allow for any foreseeable future maintenance and upgrades in a sustainable and cost effective way (16 metres for the tidal Thames and 8 metres for other rivers where possible)’.</i></p> <p>We welcome that the policy specifically mentions our set back requirements. The London Borough of Richmond contains several flood defence embankments. This is where raised ground, rather than a traditional hard engineered concrete wall, acts as the flood defence. To raise this infrastructure in the future, the areal extent of the structures will need to increase without encroaching on the river channel or limiting space for future maintenance. This section, and the supporting text, paragraph 16.74, should make it clear that some sites, specifically those defended by embankments, may need to provide more than 16 metres set back to allow for future raisings.</p> <p>As some suggested wording, Part I 3 could read along the lines of ‘Unless exceptional circumstances are demonstrated for not doing so, development should be set back from riverbanks and existing flood defence infrastructure to allow for any foreseeable future maintenance and upgrades in a sustainable and cost effective way. This must be a minimum of 16 metres for the tidal Thames and 8 metres for other rivers, although a greater set back may be required on some sites’.</p> <p>The supportive text in paragraph 16.74 could be expanded to mention that applicants should discuss appropriate set back with the Environment Agency prior to designing a site / submitting an application to the Local Planning Authority as greater set back than described in Part I 3 may be necessary depending on the flood defence design.</p> <p>Recommended action: We strongly recommend that Policy 8 part I 3 and Paragraph 16.74 of supporting text is updated to clarify that in some instances a greater set back may be required.</p> <p>Part I 3 states that set back should be achieved <i>‘...where possible’.</i> As the policy already contains the wording <i>‘Unless exceptional circumstances are demonstrated for not doing so...’</i> we believe that the <i>‘where possible’</i> wording should be removed as this reduces the strength of the policy.</p> <p>Similarly, supporting text Paragraph 16.78 states <i>‘The Council, in conjunction with the Environment Agency, will seek a buffer zone of 8 metres on the borough’s rivers (including the fluvial Thames) and 16 metres for the tidal Thames where possible’.</i> For the aforementioned reasons, the wording <i>‘where possible’</i> should be removed. If necessary, you could add the wording <i>‘Unless exceptional circumstances are demonstrated for not doing so...’</i> to reflect the policy wording.</p> <p>Recommended action: We strongly recommend that the wording ‘where possible’ is removed from Policy 8 Part I 3 and supporting text Paragraph 16.78.</p> <p><i>River Thames Scheme</i> – We welcome that the River Thames Scheme, in addition to the Thames Estuary 2100 Plan, is referenced within Policy 8 Part 4. At present, we have no additional information to pass on in relation to the River Thames Scheme. We will endeavour to keep you updated should we hear of any progress.</p> <p>Recommended action: London Borough of Richmond = no action. Environment Agency = to keep London Borough of Richmond updated on messaged around the River Thames Scheme when available.</p> <p><i>Active flood defences</i> - In the London Borough of Richmond, there are several sites that have active flood defences. For example, active flood defences include flood gates which require someone to close them for them to provide flood protection. We have also experienced several sites proposing to incorporate active flood defences in their proposed schemes. We do not accept new active flood defences as they rely on personnel to ensure they are in place which, for any number of reasons, may fail and therefore leaves areas vulnerable to flooding. This is supported by guidance set out in the TE2100 Plan. We would strongly recommend you incorporate a policy into this section of the local plan which ensures that no new active flood defences will be permitted, and which requires any developments coming forward that currently use active flood defences to replace them with permanent flood defences to achieve betterment through re-development. This will improve the flood protection of sites and ensure no new sites have inadequate protection.</p> <p>Recommended action: we strongly recommend you include a policy for no new active flood defences and replacement of existing active flood defences within Parts I or J of Policy 8.</p>

		<p><i>Ownership of flood defences</i> – The majority of formal flood defences are privately owned and it is the flood defence owner’s responsibility for maintaining those formal flood defence structures as outlined in the Metropolis Management (Thames River Prevention of Flood) Act 1879 to 1962. We recommend incorporating this information into supporting text section 16.76.</p> <p>Recommended action: we recommend you include the above information within supporting text paragraph 16.76.</p> <p>Part J states that <i>‘In addition, in line with the requirements of the Thames Estuary 2100 Plan, developments adjoining the River Thames must maintain and where necessary enhance or raise flood defences (or show how they could be raised in the future), demonstrating that they will continue to provide adequate flood protection for the lifetime of the development’</i>.</p> <p>We welcome that the plan references the maintenance, enhancement and raising of the flood defences in line with the Thames Estuary 2100 Plan. We would like to highlight that it is a requirement for any developments, adjacent to the tidal Thames statutory flood defences, coming forward now to raise the flood defences to the 2065 statutory level, as set out in the TE2100 Plan, rather than only supplying a future raising strategy, as we have previously accepted. This is because the development must be protected for its lifetime which, in most cases, would reach 2065. Whilst we would still accept a future raising strategy for how a flood defence could be raised to the 2100 statutory level, we would also recommend the defences are raised to this higher level now as part of the development rather than later. This is because of the multiple benefits that can be achieved for placemaking, biodiversity and flood risk should this flood defence crest level be considered in the design. Please see our section on the ‘Riverside Strategy Approach’ below for further information.</p> <p>Recommended action: We strongly recommend that Policy 8 Part J is updated to mandate flood defence raisings to the statutory 2065 flood level for developments adjoining the tidal Thames statutory flood defences.</p> <p><i>Please note we have some comments about basements and flood defences included within Part K.</i> [See other comment]</p>
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) - Riverside Strategy Approach	<p>Although you have made considerations for enhancing the riverside in Richmond, the TE2100 Plan’s Riverside Strategy Approach (RSA) has not been mentioned. We understand that you are applying for funding to lead a joint approach with other London Boroughs on the RSA so it would be prudent to include it within your own local plan. As Richmond has the longest frontage with significant stretches of tidal defences along the River Thames of all the London boroughs, there are substantial opportunities to improve the riverside when the defences are raised, repaired or replaced. The RSA promotes the multibeneficial outcomes that defence raising strategies, with the potential to improve public spaces, access, and to create new habitats in line with your vision. This is referred to in the TE2100 Plan as the Riverside Strategy Approach, we have produced a guidance note (attached). [See Appendix 7 for guidance note]</p> <p>We have also attached the London Borough of Richmond upon Thames’ TE2100 Council Briefing [See Appendix 7 for briefing] and will stress the importance of the document, as it outlines our requirements for the area and also contains wording which may be transferred into this local plan.</p> <p>We note that the City of London published their Riverside Strategy in November 2021 which may be useful. Please find it available at: City of London Riverside Strategy</p> <p>We would be happy to discuss this approach with you in more detail if you would like.</p> <p>Recommended action: We strongly recommend you include promotion of the Riverside Strategy Approach for the benefits to flood risk, placemaking and biodiversity that it can achieve within the Local Plan, including within Policy 8 Part J.</p>
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy)	<p>Supportive paragraph 16.75 states <i>‘Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating leisure areas and habitat’</i>. We recommend that you include reference to the fact that flood defence maintenance, improvement and raising work can also provide multiple benefits. For example, the following wording could be added to Paragraph 16.75: <i>‘There is the potential to achieve significant improvements when undertaking flood defence work, including improved public spaces, access to the river and the Thames Path, and the creation of new habitats’</i>.</p> <p>Recommended action: Add reference to the multiple benefits that flood defence works can achieve to supportive paragraph 16.75.</p>
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part K – Basements in areas of Flood Risk	<p>Whilst the requirements for basements in tidal flood zones as set out in Table 16.4 is exemplary, it is stronger than the Environment Agency position that we hold consistently across the tidal Thames. Our current position for areas of tidal flood risk is that bedrooms at basement level are acceptable if access thresholds and / or a permanent fixed barrier is installed at or above the appropriate breach flood level. As per our current approach, we may not recommend refusal if the development is contrary to the policy requirements, however we will highlight the policy in our responses for the case officer to review themselves.</p> <p>Recommended action: For information only, no action required.</p> <p>The header for both columns of Table 16.4 appear to have a formatting error, where the requirements for basements in Flood Zone 3b are the header for the whole table, even as it drops down the page. This may be a formatting error so a new title should be given for each column, and the Flood Zone 3b requirements should be moved down to the table contents.</p> <p>Recommended action: Review potential formatting error.</p> <p><i>Basements and flood defences</i> – New basements must be structurally independent from the flood defences, or sited outside of the zone of structural influence, whichever distance is greater. We recommend that this is added to Policy 8, Part K.</p> <p>This could be added within the table as <i>‘Basements and flood defences</i> - New basements must be structurally independent from the flood defences, or sited outside of the zone of structural influence, whichever distance is greater’.</p> <p>Recommended action: Add information on basements and flood defences to Policy 8, Part K.</p>
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part L – Climate change allowances	<p>Whilst commendable, using the upper end allowance for fluvial flood risk is not in line with the climate change guidance on the gov.uk website. Please refer to https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances. In the majority of cases, the central allowance is only required to be assessed.</p> <p>The London Borough of Richmond falls partially within the ‘London’ management catchment and partially within the ‘Maidenhead and Sunbury’ management catchment. For the London catchment, the central allowance is 17% and the upper end allowance is 54%. For the Maidenhead and Sunbury catchment, the central allowance is 35% and the upper allowance is 81%. The upper end allowance is considerably higher for both catchments and may result in mandating considerably higher flood levels to be taken into account for designs.</p> <p>Whilst we would support this stance, similarly to our approach to basements as discussed above, we may not be able to review Flood Risk Assessments (FRAs) in line with your policy and would instead review FRAs against the gov.uk guidance. This is to maintain consistency across the Environment Agency. We will endeavour, however, to flag this policy requirement in our responses to case officers, where possible.</p> <p>We would like to highlight, however, that a case officer may not have the ability to review whether an FRA has assessed the upper end climate change allowance. For example, they may not have experience of using the gov.uk guidance to determine the correct upper end climate change allowance percentage; they may not have access to what this modelled flood level is; and they may not be experienced in assessing whether level-for-level and volume-for-volume compensatory flood storage has been provided on site to this higher level. Therefore, we would encourage you to consider the practical implications of implementing this policy requirement.</p> <p>We would also like to highlight that those applicants using the current gov.uk guidance for climate change allowances sometimes struggle to set their finished floor levels to the current required heights. This is because they may need to be set substantially above the existing ground level which can cause conflicts with urban design and accessibility. If the council wishes applicants to use an even higher flood level, using the upper end climate change allowance, this may cause further contradictions and should be considered in deciding whether to implement this policy. There may be significant push back from developers and we would recommend that if you pursue this requirement that you provide sufficient justification and evidence for it, especially since the gov.uk guidance uses the latest evidence and data to support its recommendations.</p> <p>Recommended action: We strongly recommend that you consider the practical implications of this policy requirement before deciding to pursue it.</p> <p>We also note that since the publication of the SFRA, the climate change guidance was updated on gov.uk. The SFRA, and Sequential Test Report, mentions the 2016 climate change guidance, however, the latest guidance was published on 6 October 2021. We recommend that you consider updating the SFRA and any other documents with the latest guidance.</p>

		Recommended action: We recommend you update any reference to the 2016 climate change allowances guidance to the most up to date 2021 climate change guidance.
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) - Sequential Test and Local Centres (Paragraph 16.56)	<p>We note that following previous discussions during our SFRA engagement that you have adopted your own Sequential Test approach for development in town centres and local centres within the borough.</p> <p>We would like to take this opportunity to remind you of national guidance relating to the Sequential Test. Paragraph 019 of the Flood Risk and Coastal Change Planning Practice Guidance (PPG) states that purpose of the Sequential Test is to ensure that areas with the least risk from flooding are developed in preference to areas at higher risk. Paragraph 020 goes on to state ‘<i>the Sequential Test should be applied to the whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk</i>’. This is to give as many opportunities as possible to build in Flood zone 1. The proposed stance of not requiring the Sequential Test, subject to certain criteria for the 800m buffer zone around town and local centres, will restrict the ability to move development to lower risk flood zones. Paragraph 020 also states that ‘<i>more than one local planning authority may jointly review development options over a wider area where this could potentially broaden the scope for opportunities to reduce flood risk</i>’. It removes the requirement of the Sequential Test, rather than broadening its search criteria. Therefore, the effectiveness of the Sequential Test, a tool to ensure areas of least flood risk are developed as a preference, is weakened and may lead to high risk flood zones being developed where alternative appropriate sites may have been available in other parts of the borough.</p> <p>We advise that if this local Sequential Test methodology is taken forward then we would advocate for minimizing the buffer zone as much as possible. This will increase the number of sites that must apply the Sequential Test and therefore maximizes the possibility for development to be located elsewhere in areas at lower risk of flooding.</p> <p>The Environment Agency is not responsible for objecting to or endorsing a certain Sequential Test method as responsibility lies with the Local Planning Authority and your case officers to assess its implementation. Our role is to highlight the national policy and provide guidance on the risks and how this may impact development and flood risk at a local level.</p> <p>Recommended action: We recommend you consider the impacts of your Sequential Test approach in general and to consider minimising the buffer zone as much as possible. Please refer to our sustainability appraisal section for further comments on the Sequential Test approach.[See other comment]</p>
George Goodby, Environment Agency	Additional comments – Flood Risk Activity Permit requirement	<p>The Flood Risk and Sustainable Drainage Policy and supporting text does not reference the requirements for an Environment Agency Flood Risk Activity Permit (FRAP), which may be required in addition to planning permission in some locations. We recommend that the supporting text references this to make applicants aware of other permissions they may need. Please see the following standard wording that may be useful:</p> <p>“The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:</p> <ul style="list-style-type: none">• on or within 8 metres of a main river (16 metres if tidal)• on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)• on or within 16 metres of a sea defence• involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert• in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it’s a tidal main river) and you don’t already have planning permission <p>For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.</p> <p>The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity”.</p>
George Goodby, Environment Agency	Policy 8. Flood Risk and Sustainable Drainage (Strategic Policy) - Sustainable Drainage, Flood Defences	<p>Sustainable Drainage</p> <p>Where feasible, SuDS should incorporate above ground features that are designed to maximise their ecological and aesthetic value and improve water quality. Any outfalls should be via open flow routes that have minimal impact on the receiving watercourse.</p> <p>Flood Defences</p> <p>There should be an emphasis on working with natural processes to reduce the risk of flooding. Examples include using soft engineering approaches to bank protection works on the River Thames wherever possible, which would provide multiple benefits for flood alleviation, biodiversity and helping watercourses achieve good ecological potential under the requirements of the WFD. We are pleased to see a requirement for 16 metre buffer zones for the Tidal Thames and 8 metre buffer zone for other main rivers (including fluvial sections of the Thames) has been included. However, this should acknowledge the multiple benefits of undeveloped river buffer zones, including the benefits for biodiversity and efforts to achieve objectives under the WFD. Please see our comments on Policy 40 in this section for further information and guidance on what we would wish to see in an undeveloped river buffer zone policy. [See comment on Policy 40]</p>
George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Additional comments – multiple benefits and interconnected issues	<p>Flood risk management requirements, such as setting back developments from main rivers and flood defences and promoting a Riverside Strategy Approach, can deliver multiple benefits, not just in terms of flood risk through better protection and increased storage but also biodiversity improvements and improvements to the public realm. We would support the planning policies cross-referencing each other to greater identify the connectivity between the points. For example, Policy 8 Flood risk and Sustainable Drainage and Policy 40 – Rivers and River Corridors should both promote this message. Similarly, as flood defences are located along river corridors it is important that applicants reading policy 40 do not miss out on key messages stated in Policy 8.</p> <p>Recommended action: We recommend enhancing the plans emphasis on the multiple benefits that can be achieved through design for flood risk, biodiversity, access to the river and public realm for example.</p>
George Goodby, Environment Agency	Policy 8. Flood risk and sustainable drainage (Strategic Policy) – Paragraph 16.63 in relation to islands and functional floodplain designations	<p>Paragraph 16.63 of the Draft Local Plan states that ‘<i>The borough contains a number of islands in the River Thames. Where the access and egress to and from the island is within the functional floodplain, for the purposes of new development, such islands will be considered and treated as functional floodplain (Zone 3b), even if parts of the islands may be within an area of lower probability of flooding</i>’.</p> <p>We would like you to clarify what you consider to be in the functional floodplain for this definition. In the past, we have highlighted that even structures that are elevated (e.g. on raised platforms or stilts) above the 1 in 20 modelled flood level are still within the functional floodplain. This has been supported at an appeal by the inspector (For example ‘The Barge Dock, Kingston’; LPA ref: 18/12421/FUL; PINS ref: APP/Z5630/W/19/3231378; dated January 2020). Similarly, during pre-application discussions for the Twickenham Riverside development, you recently supported us in this stance where a pub raised above the flood level on stilts was proposed partially in the functional floodplain. If you support this stance, then paragraph 16.63 should be reworded to reflect this as currently surely all access and egress to and from any island would pass over the main river channel itself and therefore be partially within the functional floodplain. Perhaps the wording should be updated to ‘<i>Where the access and egress route to and from the island begins within the functional floodplain...</i>’ or ‘<i>Where the access and egress route to and from the island would be submerged in a 1 in 20 flood event...</i>’.</p> <p>Recommended action: We recommend you clarify the wording in paragraph 16.63 regarding functional floodplain and island sites.</p> <p>If the access and egress to and from any island is considered to be within the functional floodplain, and therefore the island is considered to be wholly within the functional floodplain, then only water compatible development or essential infrastructure (subject to the Exception Test) would be permitted. For example, if the access and egress to and from Platts Eyot is considered to be within Functional Floodplain, then residential development should not be permitted on the island as promoted within Site Allocation 2 if required for viability. In order to determine whether the island should be considered as functional floodplain, more details would need to be confirmed. For example, comparing a detailed topographical survey against the 1 in 20 flood level and giving details about the safe access and egress route and hazard ratings, which would also support whether the Exception Test is passed. Therefore, until this work is carried out, which we would expect</p>

		<p>in a Level 2 SFRA prior to completing the Regulation 19 Local Plan, we cannot determine whether residential development would be acceptable on the island in line with Table 3: Flood risk vulnerability and flood zone ‘compatibility’ of the National PPG. This should be made clear in the Site Allocation for Platts Eyot and in Paragraph 16.36.</p> <p>Recommended action: We recommend that within any site allocations for islands that they are caveated with reference to paragraph 16.63 and reminded of Table 3 of the PPG and other flood risk policies.</p> <p>[See also comment in relation to Platt’s Eyot Island]</p>
Simon Tompsett, Richmond & Twickenham Friends of the Earth	P158 Policy 8. Flood risk and sustainable drainage	– seems to be focussed on preventing all flooding but certain areas of the Borough (Petersham Meadows, Old Deer Park etc) might be better to allow some flooding to defend other areas.
Hilary Pereira, River Thames Society	Policy 8. Flood risk and sustainable drainage, p161, and separate from the issue of counting islands as within the functional floodplain p164	Another feature of Richmond is the number of Thames islands the Borough includes, even though the Richmond bank may not be the most adjacent. Richmond can claim the Brentford Aits, a strip of Lots, the flowerpot islands, Corporation, Glovers, Eel Pie, Swan, Teddington lock, Trowlock, Taggs, Ash, Garricks, and Platts Eyot. Other local islands belong elsewhere, with Chiswick, the rest of Lots, Olivers, and Isleworth falling to Hounslow; Kingston claiming Stevens and Ravens, and Elmbridge Thames Ditton and Benn's. Clarity would be helpful in the plan how the EA's general rules about limiting development within 8/16 meters of the nontidal/tidal river would apply for construction on islands, noting all the local islands with existing built development have this much closer to the water's edge. Flood defences on islands have only a local and not more general importance. [policy 8, p161, and separate from the issue of counting islands as within the functional floodplain p164]
	Policy 9: Water resources and infrastructure (Strategic Policy)	
Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 9. Water resources and infrastructure (Strategic Policy)	We would prefer Policy 9 C 1 to be amended to state: “where rivers have been classified by the Environment Agency as <u>failing to meet ‘good’</u> status, any development etc” as this is the target standard for the Water Framework Directive. We support the Plan’s requirement that developers should “take action to minimise the potential for misconnections between foul and surface water networks.” Delivery of these expectations will be dependent on effective inspection and sanctions regimes by the Council. We support the Plan’s adherence to the Water Framework Directive requirement that “‘good status’ or ‘good ecological potential’ should be achieved by 2027.” When considering applications for developments which will increase demand for water services, the Council should consider impacts on Combined Sewage Outfalls, as these are a significant and increasing contributor to sewage pollution of rivers.
James Stevens, Home Builders Federation (HBF)	Policy 9: Water resources and infrastructure (Strategic Policy)	<p>Parts D, E, and F of the Policy are unsound as developers, in law, have a right to connect, and accompanying this is a legal duty on companies providing water supply and wastewater services, to meet the needs of the plan-led system.</p> <p>In law, by virtue of s106 of the Water Industry Act 1991 (WIA 91), developers, including housebuilders, have an absolute right to connect to the public sewerage system. In a modern-day context this right has persisted since the Public Health Act 1936. It has also been upheld in several Court decisions since the 1950’s and more recently in the Supreme Court decision (2009) in Barratt versus Welsh Water. It is accompanied by a statutory duty placed on the water industry (companies providing water supply and wastewater services) to meet the infrastructure needs of the plan-led planning system - a material requirement under s94 (1)(a)(b) of the WIA 1991. The duty of a sewerage undertaker pursuant to s94 is enforceable under s18 of the WIA1991 by the Secretary of State or on the direction of the Secretary of State by the Regulator (Ofwat). In addition, the duty under s94 is supplemented by the need to comply with the Urban Waste Water Treatment (England and Wales) Regulations 1994 which provide that the duty under s94(1)(b) shall include a duty to ensure that urban waste water is, before discharge, subjected to the appropriate treatment as required/influenced by other facets of environmental legislation.</p> <p>The requirements of this policy would, consequently, be contrary to the approach that has been established nationally, and in law, by placing the onus on the applicant to demonstrate capacity rather than the provider of water services to ensure that it invests to meet planned requirements as established in the London Plan 2021 and cascaded down to local authorities.</p> <p>Part G states that contributions from housebuilders might be required to pay for the provision of water infrastructure. The housebuilding industry is already required to make payments to water bodies to ensure that investment in water infrastructure is supported to meet the requirements of the plan-led system.</p> <p>It should be noted that the home building industry already provides considerable resources to water companies in the form of Infrastructure Charges as well as new assets. It is estimated, although unaccounted for officially, that Infrastructure Charges have boosted Water Companies’ coffers by up to £3 billion since such levies were introduced in the early 1990s. Relevant annual accounts published by Water Companies illustrate the value of charges and assets to overall balance sheets. By way of example, Severn Trent Water reports that in the past two years it has received £116 million from developer charges in addition to £50 million worth of new assets as well as another £31.6 million from ‘other charges relating to the provision of infrastructure’ as developers are typically charged hundreds of pounds at various points throughout the process, including charges of around £300 for pre-planning checks on whether a connection can theoretically be made.</p> <p>We see no need for local planning policy to stipulate further payments to water companies to allow new residential development to connect. This will only divert the amount of planning gain available for other public policy goals, especially the supply for affordable housing, to subsidise the failures of the water industry.</p>
David Wilson, Thames Water	Policy 9 - General Water and Wastewater Infrastructure	<p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.</p> <p>Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “<i>Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...</i>”</p> <p>Paragraph 11 states: “<i>Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects</i>”</p> <p>Paragraph 28 relates to non-strategic policies and states: “<i>Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...</i>”</p> <p>Paragraph 26 of the revised NPPF goes on to state: “<i>Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....</i>”</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>Policy SI5 of the London Plan 2021 relates to water and wastewater infrastructure and supports the provision of such infrastructure to service development.</p> <p>We therefore support the section on ‘Water and Sewage Infrastructure’ in Policy 9 as it is in line with our previous representations.</p> <p>In line with the guidance in the NPPF, Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them.</p> <p>This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and</p>

		<p>plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies’ AMP8 Business Plan will be agreed with Ofwat during 2024.</p> <p>Hence, a further text should be added to Policy 9 as follows: <i>“The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”</i></p> <p>In 2019/20, Thames Water pledged to reduce their net carbon emissions from their operations to zero by 2030.</p> <p>In 2020/21, Thames Water generated 23% of their own electricity needs from renewable sources including sludge, wind and solar power. Most of the renewable electricity Thames Water self-generate comes from the treatment of sewage sludge via anaerobic digestion, but we are also exploring new opportunities such as solar panels and heat recovery and these should be supported in accordance with the London Plan and NPPF 2021 which sets out at paragraph 148 that the planning system should support renewable and low carbon energy and associated infrastructure.</p>
George Goodby, Environment Agency	Policy 9. Water resources and infrastructure (Strategic Policy) - Water resources and quality	<p>Water resources are critical to sustainable economic growth and housing development as well as supporting the natural environment. Increasing population and a changing climate will have an impact on water resources in the future. The local plan can help to ensure that water resources are protected and, where evidence justifies, that water efficiency measures are adopted as part of regeneration and development. The Local Plan should recognise that The London Borough of Richmond upon Thames has been classified as an area of serious water stress and that there is limited water resource availability, along with demand and supply issues as set out in Water Companies Water Resource Management Plans (WRMP’s). We do not see any mention of this classification within the Local Plan. We would refer to the following report which sets out the results of the Environment Agency's determination of areas of water stress that took place in 2021. Water resource planning does not follow local authority boundaries. Planning for water resources and water supply in the emerging local plan should reflect the plans of neighbouring local councils and water company resource zones. Cross-boundary working should form part of work under the Duty to Co-operate. The process will be more effective and better informed if it involves water supply companies.</p> <p>The emerging local plan should consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future across the borough area. Projected water availability should take account of the impact of a changing climate. Water companies hold information and data to help with this and the council should work closely with water companies when they are producing the local plans.</p> <p>We would encourage the council to ensure the emerging local plan and major developments identify and plan for the required levels of water efficiency and water supply infrastructure to support growth, taking into account costs and timings/phasing of development. The Infrastructure Delivery Plan can help with understanding of what is needed and is therefore an important part of the evidence base.</p> <p>We support the use of water efficiency measures to reduce demand on water resources and to accommodate growth in business, housing and population requirements without the need to increase overall consumption.</p> <p>We encourage the council to use evidence and talk to the water companies to identify where new infrastructure is planned/needed to deliver the development required in the Local Plan.</p> <p>All new homes should continue to meet the mandatory national standard set out in the Building Regulations of 125 litres/person/day (l/p/d). Where there is a clear local need, councils can set out local plan policies requiring that new dwellings meet the tighter Building Regulations optional requirement of 110 l/p/d (as set out in the Planning Practice Guidance), due to the area being designated Water Stressed and the limited water availability within our catchments we would be seeking Local Authorities to apply 110l/p/d.</p> <p>Where a water company has an ambitious efficiency related commitment or target (as an example; Southern Water currently has a commitment called ‘target 100’: Target 100, together let's hit target 100. (southernwater.co.uk)), we support this and it should be supported by the Local Authorities own policies. There should be a collective drive to aspire for greater water efficiency standards. The National Framework report sets out what is required to see greater ambition on water efficiency. In the report, the agency set out that we expect the regional water resources groups (therefore water companies) to contribute to a national ambition to reduce individual water use.</p> <p>The South East is an area under “serious” water stress. In addition, the Environment Agency's assessment of water availability and the impacts of existing abstraction on the aquatic environment in the area shows most of the catchments are heavily abstracted with unsustainable abstractions occurring to the detriment of the environment.</p> <ul style="list-style-type: none">• This means that there is limited environmental capacity locally to support further abstraction to meet demand from new development and therefore Local Authorities must ensure sufficient water efficiency measures are built into their core strategy policies. Increasing resource availability therefore needs to focus on optimising the use of existing resources. To do this, development in this area will require the highest level of water efficiency activity and therefore more stringent water consumption targets than those set out by Building Regulations, which may be adequate for other parts of the country.• Water Companies’ Water Resource Management Plan (WRMP) - The water companies are required to produce Water Resource Management Plans which set out the long-term (25 year) balance between increasing demand and available supply. On the basis that Water Companies are having to put forward options to meet future demand i.e. reservoirs, development of ground sources, demand management, all adds to the evidence - demonstrating current resources are not adequate to meet future demand (see individual Water Company websites for WRMP). It is up to Government, Local Authorities, water companies, the Environment Agency, Ofwat, and all stakeholders, to help and encourage people and businesses to use water more efficiently.• When Local Authorities and developers are planning sustainable growth, it is a useful exercise to carry out a water cycle study. A water cycle study can inform wider local planning policy requirements.
George Goodby, Environment Agency	Policy 9. Water Resources and Infrastructure (Strategic Policy) - Water Quality	<p>We are pleased to see the plan acknowledges the importance of protecting rivers for water quality and states a desire to improve these waterbodies. None of the WFD Waterbodies within the borough achieve good ecological status/potential. Mention should be given to how this can be achieved, for example through river restoration projects and soft engineering approaches to bank protection.</p> <p>We would encourage the council to produce a supplementary advice note for developers who are undertaking bank protection works in Richmond upon Thames. We would be happy to assist in the production of this advice.</p> <p>The use of hard engineering techniques is a specific local issue that we commonly see when responding to planning applications within the Borough. Engineered river channels are one of the most severe examples of the destruction of ecologically valuable habitat.</p> <p>We seek to restore and enhance watercourses to a more natural channel wherever possible. We aspire to return currently engineered riverbanks to a more natural state where possible. This has multiple benefits in that, as well as improving the geomorphology of the river and providing habitat for wildlife, it increases flood storage and provides aesthetic value.</p>
George Goodby, Environment Agency	Policy 9. Water resources and infrastructure (Strategic Policy)	<p>We welcome the inclusion of this policy unit. With reference to Water Quality we wish to note that other policies will be relevant in order to protect these supplies – such as those relating to land contamination (as historic contamination in land can lead to discharges of polluting substances to rivers and groundwater), and those relating to surface water drainage systems (as inappropriate drainage to ground for example can cause groundwater pollution).</p> <p>We would like to see the requirements for construction sites to include strict adherence to the regulatory position statements regarding dewatering. Each construction plan should contain specific details of how these requirements have been incorporated into the build plan:- https://www.gov.uk/government/publications/temporary-dewatering-from-excavations-to-surface-water</p> <p>In addition, we would like to see within the construction method statements specific details of how silt/site run-off will be managed e.g protection of roadside drainage from silt ingress. In this way pollution of surface water via the surface water/road drainage network can be eliminated/reduced. This is particularly important in relation to any developments in close proximity to the important Water Framework Directive watercourses within Richmond.</p> <p>Each construction plan should include a specific section noting whether any site activity requires a Flood Risk Activity Permit.</p>

	Delivering new homes and an affordable borough for all	
Jon Rowles	Delivering new homes and an affordable borough for all	<p>The Town and Country Planning Association state that 20-minute neighbourhoods without adequate social housing is just gentrification. Richmond has delivered the lowest level of housing in London in recent years – and the outlook is the same. The existing housing associations operating in the borough have a limited ability to build more housing due to the size of their estate and increasing numbers much further would push them above prudential levels. If there is to be a step-change in the volumes built the council would have to attract new housing associations to the borough or have to start building council houses (the Richmond and Wandsworth joint service builds and manages council housing for Wandsworth so the expertise is on hand). Housing Associations also charge higher rents than the equivalent council house on average. I do not understand why Richmond is so reluctant to help the neediest members of our society, by not focusing on housing delivery that results in the lowest rents.</p> <p>The lack of social housing also means that new tenants no longer have lifetime tenancies and therefore have much less security and face the prospect of being forced to move as they get older, either into a smaller flat or pushed out of the sector altogether and into the private sector. I feel this coalition government austerity measure (designed to make life less comfortable for those in receipt of state assistance) needs to end and the social housing tenants should be getting lifetime tenancies.</p>
Hannah Bridges, Spelthorne Borough Council	General comment in relation to Housing	<p>In respect of housing, we recognise that this is a strategic and cross boundary issue. Officers acknowledge that like Spelthorne, Richmond is a constrained borough, and we face many similar constraints. Spelthorne is supportive of LB Richmond’s plans to meet its housing target derived from the London Plan; however, every effort should be made to address housing needs in the Greater London area more widely. Whilst the Mayor of London is responsible for the overall distribution of housing need in London, we recognize that there remains a notable amount of unmet need in the Greater London area therefore further work should be undertaken to review the implications associated with this and to identify further capacity options to ensure this is met within Greater London.</p> <p>The emphasis on higher density development and smaller units is supported but could have implications for Surrey, since previous under-delivery in London and lack of affordable family units has added to housing pressures in Surrey districts and boroughs with associated implications for infrastructure in our areas.</p>
Suzanne Parkes, Elmbridge Borough Council	Direction for development – new housing & development sites, Meeting demand from outside of the Borough	<p>Thank you for consulting Elmbridge Borough Council (EBC) on the above document.</p> <p>It is noted that the response deadline has passed and therefore our officer comments may not be considered as a formal response to this Regulation 18 stage. I sincerely apologise for this and I hope you understand that our resources have been focused towards our own Local Plan and taking our pre-submission draft through our decision-making processes.</p> <p>Nevertheless, I hope you will still find our officer comments useful and will be able to reflect on these when moving forwards in your plan-preparation as well as those comments made at our meeting on 24 January 2022 to discuss our respective Local Plans and strategic crossboundary issues.</p> <p>Direction for development – new housing & development sites</p> <p>As with many other local authorities we recognise the difficulties in delivering sustainable growth and the challenge of effectively balancing competing environmental, social and economic pressures.</p> <p>Officers note that the target set for the London Borough of Richmond upon Thames (LBR) by the London Plan is 411 homes per annum (4,110 homes in the ten-year housing target) and, that Policy 10 ‘New Housing’, states that the LBR will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan Policies.</p> <p>Officers note that the top end of the approximate number of units to be delivered in each area (as set out in Policy 10) equates to 4,800 dwellings and, that the details of the sites are set out in the latest Authorities Monitoring Report (AMR) 2019/20. However, for greater transparency and certainty, it would be useful if within each of the allocations, the indicative number of units to be provided is set out.</p> <p>In moving forwards with your plan, should further consideration of sites and the strategic approach of the emerging Local Plan to meeting housing need change i.e. need can no longer be met, we would wish for these to be discussed with EBC as part of our on-going Duty to Cooperate meetings and in advance of any future formal public consultations.</p> <p>As with all our other neighbouring boroughs and districts, EBC is keen to continue working with you and other authorities to meet the identified development needs of our areas, ensuring that the best and most suitable sites are brought forward for development and that other strategic planning matters are continuously addressed with the key principles of sustainability at the forefront.</p> <p>Meeting demand from outside of the Borough</p> <p>As a neighbouring authority you will be aware of the development needs of Elmbridge Borough and the constraints to meet these including, the consideration of Green Belt. You will also be aware that EBC has taken the decision (at its Full Council meeting on 22 March 2022) to pursue a spatial strategy that will not meet it local housing need figure (as set by the Standard Methodology).</p> <p>In your response to our letter dated 18 October 2021, asking whether you can help assist EBC in meeting any of our potential unmet housing need, your response dated 11 November 2021, stated that:</p> <p>“...At this time therefore, we do not have any spare housing capacity to meet unmet need from any other boroughs, particularly from outside London. Indeed, if we were able to meet our own future housing need and/or even exceed the London Plan target (the new target of 411 per annum is a challenging increase from the previous target of 315 per annum), as these are not applied as a cap, we would be seeking to exceed those rather than meeting another borough’s need”.</p> <p>In light of your latest consultation showing that the LBR could potentially exceed the London Plan target circ. 700 homes across the 10-year plan period, I would be grateful if you could inform EBC if your position on meeting any of Elmbridge’s unmet need has changed.</p> <p>Further discussions regarding this point would be welcomed as part our on-going engagement.</p>
	Policy 10. New Housing (Strategic Policy)	
Tim Catchpole, Mortlake with East Sheen Society	Policy 10. New Housing (Strategic Policy)	<p>We note that the housing target for Barnes, Mortlake and East Sheen in the next 10 years has increased from 400-500 in the current plan to 800-900 in the Update Plan. We see this target as being met substantially from the Brewery and Barnes Hospital redevelopments and we firmly believe that any increase beyond this will put a significant strain on our physical and social infrastructure which is already at breaking point.</p>
Theresa Oddelm, The Royal Parks	Policy 10 New Housing	<p>We note that the Borough’s ten-year housing target is 4,110 homes to be completed by 2029. The number of homes to be delivered within close proximity to Richmond Park is around 1,200 and around 1,000 within close proximity to Bushy Park. This would almost certainly result in an intensification of visitors to the Parks. Capturing some of the value of these developments, through S 106 or CIL payments, would seem appropriate in this instance to help The Royal Parks ensure that the Parks can continue to cope with the resultant increase in visitor numbers and their increasing importance as open green space for residents of the Borough. It will be important for The Royal Parks to be involved further on in the plan process to ensure that development is appropriate in the context of the Parks.</p>
James Stevens, Home Builders Federation (HBF)	Policy 10. New Housing (Strategic Policy)	<p>The Plan aims to provide 4,110 homes over the next ten years, or an annual average of 411 dwellings per annum (dpa). It would be helpful if the Plan could specify precisely which ten years this target will operate over as the London Plan covers the period 2019/20 -2028/29 (as draft paragraph 17.1 acknowledges). We assume that the Council will aim to deliver this figure for the ten-year period following the date the plan is adopted.</p> <p>We agree that the minimum housing requirement for Richmond-upon-Thames for the next ten years should be 4,110 homes. London is treated as a single housing market area by the Greater London Authority (GLA), as para. 4.25 of the Draft Plan acknowledges, which assesses housing need for the whole of London. This overall requirement is then apportioned among the 35 local</p>

planning authorities on the basis of judgements made about capacity within each local authority. Each local authority should endeavour to deliver the housing figure allocated to it by the London Plan 2021.

Whether this is the right figure to base the plan upon is arguable in view of the now apparent strategic shortfall in planned housing provision across London as a whole as well as the more local evidence of need.

The Council will be aware that there is a shortfall in the supply of land for housing across the whole of London compared to the overall assessed need. The assessed need is for 66,000 homes per year for the next ten years, compared to an estimated capacity for just 52,000 homes – 40,000 homes per year on identified large or strategic sites and 12,000 homes per year on small sites that the GLA estimates should come forward each year from 2019/20.

Asd described in paragraph 17.14, the Council’s own assessment of housing need – the Local Housing Need Assessment 2021 (LHNA) – estimates a net annual need for 1,123 affordable rented and 552 home ownership products to be provided between 2021-2039 – figures of need well in excess of the London Plan requirement for Richmond (411 per annum).

Housing delivery across London as a whole is also failing to keep pace with the requirements of the new London Plan:

DLUHC Live Table 122: Net additions to the dwelling stock

London		
Year	2019/20	2020/21
Net additions	40,870	37,183

Against a requirement for 104,000 homes to have been provided in the first two years of the London Plan (52,000 x 2), London is already facing a deficit in the delivery of 25,947 homes.

We are aware that Richmond-upon-Thames has been performing well against the delivery of its target as set by the London Plan, but as London is a single housing market, and because delivery against the overall strategic housing target is faltering, there is an argument that the Council could do more to make a greater contribution towards addressing the wider-housing shortfall.

The Council has a greater challenge on its hands in terms of housing delivery compared to the London Plan of 2016 which only required 315 net additional home a year. Land supply is tight within the borough.

We have reviewed the Council’s *Green Belt, MOL, LGS and OOLTI Review* (August 2021). The report concludes that Green Belt, Metropolitan Open Land (MOL), and Local Green Space (LGS) perform strongly against the assessment criteria published in the NPPF. However, some of the OOLTI sites perform weakly and could be considered by the Council for release as sites for housing. The Council should also rethink its approach to development on back garden land which is generally too restrictive.

Large sites supply

The Plan contains few large site allocations for housing. The Plan, in the main, relies upon yields from broad areas.

Part B of Policy 10 provides an indication of how many homes are expected in each of the broad areas. These are set out in Table 17.1 which is reproduced below.

Area	Wards ⁽¹⁾	Approx. No of units
Richmond	South Richmond; North Richmond; Kew	1,100 – 1,200
Ham & Petersham Neighbourhood Area	Ham, Petersham and Richmond Riverside ⁽²⁾	250 - 300
Twickenham	Twickenham Riverside; St Margarets and North Twickenham; South Twickenham; West Twickenham	1,100 – 1,200
Teddington and the Hamptons	Hampton North; Hampton; Fulwell and Hampton Hill; Teddington; Hampton Wick	900 – 1,000
Barnes and East Sheen	East Sheen; Mortlake and Barnes Common; Barnes	800-900
Whitton	Whitton; Heathfield	100-200

According to this table, at best – the upper range - some 4,800 homes might materialise over the course of the Plan. At worst – the lower range - the supply might be 4,250 – a figure that just exceeds the London Plan requirement for Richmond of 4,110. Both figures – upper and lower ranges – represent a very slender housing land supply.

It is unclear how the site allocations in the areas described in chapters 6 to 14 relate to this table. However, it appears that the Council is relying to a large extent on yields, or windfall homes, from these broad areas, rather than active measures on its part to identify sites. We note, furthermore, that many of the site allocations described in the areas section are expected to provide affordable homes only.

It would be helpful if the Council spelt out in more concrete terms the number of homes expected on each of its allocated sites.

Small sites supply

The London Plan expects Richmond to supply 2,340 homes on small sites over the next ten years – that is sites of 0.25 hectares or less. This is set out in Table 4.2 of the new London Plan. This represents 57% of the Council’s overall requirement. National policy also expects local authorities to identify and allocate sites for small developments, equivalent to 10% of the overall housing supply (NPPF, para. 69). The reason for this intervention by Government is to ease the process by which small developers have to establish the principle of residential development, thereby helping with speedier delivery and increasing the number of SME developers.

London Plan Policy H2, Part B, 3) also encourages local authorities to identify and allocate small sites:

3) identify and allocate appropriate small sites for residential development

Some of the allocations listed in the areas chapters of the Plan are on sites that are smaller than 0.25 hectares in size but not every site is allocated for housing in whole or in part, and the number of homes to be accommodated on many of these sites is also unclear.

It would be helpful, therefore, if the Council was able to identify and allocate more small sites across the borough to assist in the delivery of the 2,340 homes required on sites of 0.25 ha in size or less.

Other Open Land of Townscape Importance (OOLTI)

		<p>Given the slender land supply, we recommend that the Council rethinks its approach to retaining so much OOLTI. Protecting such large swathes of the borough through various designations, including OOLTI, is unjustified given the documented housing problems in London generally and Richmond-upon-Thames more specifically.</p> <p>The Council’s <i>Green Belt, MOL, LGS and OOLTI Review</i> (August 2021) shows that three sites perform weakly against the criteria it has applied to assess the value of OOLTI sites. As Section 7.4 of the report summarises:</p> <p><i>This study considered how well the existing 168 OOLTI meet the Local Plan Policy LP14 OOLTI criteria. The majority of sites were found to meet the criteria, with only three sites considered to be weakly performing.</i></p> <p>One of these sites offers potential for being allocated for housing. This is site 57: York House car park. Site 59: Harlequins Site has some potential but as people are already living in the apartments on the site, it is highly unlikely this will be redeveloped for housing over the next ten years.</p> <p>It is unclear from the Plan whether the York house Car Park site has been allocated for housing.</p> <p>Back gardens</p> <p>Residential development in back gardens is also a potential source of housing supply. As the report observes, designation as OOLTI does not remove permitted development rights unless such areas are also historic environment designated areas (e.g. conservation areas). New Government planning policy, however, as well as the London Plan, is keen to tap back gardens, and suburban areas more generally, as potential sources of land supply for housing.</p> <p>Policy H2, Part B, 1) of the London Plan states: Boroughs should:</p> <p><i>1) recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites</i></p> <p>In contrast to this, the wording of the Local Plan policy is very much orientated towards conserving the existing character. The Council’s policy on back gardens is very restrictive. Policy 15, Part B, includes many conditions while point 11 states baldly: <i>Result in no significant loss of garden land, unless in some cases a well-designed backgarden development at an intimate scale with appropriate mitigation such as to improve biodiversity, accords with all the factors above and there is no identified harm to the local area.</i></p> <p>The net result of all the conditions imposed by Policy 15, Part B is to make it virtually impossible to build on back gardens, thereby neutralising the Government’s objective of ‘gentle densification’.</p> <p>Moreover, stipulating ‘no identified harm to the local area’ is a very general expression. The Council has already listed its conditions for back garden development. There is no justification for the addition of this further, vague, category.</p> <p>We recognise the political sensitivity surrounding the development of back gardens, but the Council should avoid erecting unnecessary barriers to a form of development that has the potential to increase housing delivery in the borough and assist SME developers.</p>
Anna Russell-Smith, Montagu Evans on behalf of South West London and St George’s Mental Health NHS Trust	Policy 10. New Housing (Strategic Policy)	<p>LB Richmond’s London Plan Residential Target is a minimum of 4,110 units over the next ten years (411 units per annum). This target figure is reflected in emerging Policy 10 (New Housing – Strategic Policy). Part B of the policy goes onto set out indicative ranges for areas within the Borough with Barnes and East Sheen (for which Barnes hospital falls within) having an approx. target of 800-900 units over the next 10 years (80-90 units per annum).</p> <p>In line with London Plan Policy H1 this target is expected to be achieved through optimising the potential for housing delivery on all suitable, deliverable and available brownfield sites. It is therefore supported that, on the basis that community uses is not delivered in full or part across a site, that residential accommodation could be a suitable alternative use on this brown field, urban site and as set out above should be reflected within the policy.</p>
Rob Cummins, RHP	Delivering new homes and an affordable borough for all	<p>Policy 10 sets out the Borough’s Housing Policy, referring to the 10-year housing target for 4,110 homes. It also stated that the Council will exceed this minimum requirement. This is supported.</p> <p>Policy 10 also includes a table to provide guidance on how the new homes will be distributed across the borough. Whilst the supporting text acknowledges that the target is derived from the London Plan, the policy would benefit from a clear reference to the number of homes being a <u>net</u> target. The distinction is particularly important for Ham Close, where there are currently 192 homes on site, and the redevelopment will enable 452 homes (+260).</p>
Nina Miles, GLA on behalf of Mayor of London	Policy 10. New Housing (Strategic Policy)	<p>The Council’s commitment in Policy 10 to exceed the borough’s ten year London Plan housing monitoring target of 4,110 homes through the optimisation of all suitable and available brownfield sites is welcomed and we are pleased to note that housing delivery against the borough target is capable of being met without the release of employment land.</p> <p>We note confirmation within the Plan that the housing target can be rolled forward for future years, however this will need to be carried out in accordance with paragraph 4.1.11 from the LP2021.</p>
Mark Connell, Sphere25 on behalf of Hill Residential	Policy 10 New Housing	<p>Policy 10 sets out the Borough’s Housing Policy, referring to the 10-year housing target for 4,110 homes. It also stated that the Council will exceed this minimum requirement. This is supported.</p> <p>Policy 10 also includes a table to provide guidance on how the new homes will be distributed across the borough. Whilst the supporting text acknowledges that the target is derived from the London Plan, the policy would benefit from a clear reference to the number of homes being a <u>net</u> target.</p> <p>The distinction is particularly important for Ham Close, where there are currently 192 homes on site, and the redevelopment will enable 452 homes (+260).</p> <p>Table 17.1 presently refers to the Ham & Petersham Neighbourhood Area delivering between 250- 300 homes. In the context of Ham Close being able to deliver and additional 260 homes alone, and with potential development of Cassell Hospital coming forward in the medium term - the housing target is considered too low. It does not optimise the delivery of new homes in the area.</p> <p>It is considered that a net target of 300 – 350 homes is more appropriate and the table be changed accordingly</p>
Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 10 - New Housing	<p>We support the delivery of a minimum of 4,110 new homes across the borough, particularly the 1,100 – 1,200 new homes proposed within Twickenham (noting as stated above, there appears to be an inadequate number of draft site allocations for housing within sustainable locations in Twickenham to achieve this objective). This target is in line with the London Plan target of 410 units per annum between 2019/20-2028/29. The supporting text sets out that this target is expected to be achieved, through optimising housing delivery on all suitable and available brownfield sites – with 57% expected to be delivered on small sites (234 units per annum).</p> <p>It is also noted that the borough is on course to meet and exceed the strategic dwelling requirement over a ten-year period. The Council’s latest Annual Monitoring Report (AMR) 2019-2020 identifies that in that period 331 new homes were delivered, which falls short of the 410-target set by the London Plan. The supporting text of the policy goes onto note that “<i>Meeting the higher housing target in the London Plan 2021 will be a challenge, given the constraints in the borough and meeting other plan proprieties.</i>” Moreover, the Council’s Local Housing Needs Assessment (stage 1) (July 2021) shows that even meeting the target of 411 homes per annum would generate a shortfall against local need (potential scale of need for 1,123 rented affordable and 552 shared ownership homes per annum). Given this housing challenge, we would encourage the Council to increase the number of draft site allocations for housing, including the Greggs Bakery site.</p> <p>This would reduce Council’s reliance on small housing sites, which typically result in few affordable new homes and can often also become unviable due to other competing planning policy requirements, a challenging planning process and financial obligations, including the Council’s proposed high rate of carbon offset payment.</p> <p>Finally, the supporting text to draft Policy 10 notes that “<i>Housing delivery against the borough target is capable of being met without the release of employment land, although there may be limited potential for enabling housing gain on employment land if proposals increase the level of existing employment floorspace.</i>” This is not demonstrated in the latest AMR available (2019-2020) and without an updated AMR for 2020-2021 to demonstrate this, this statement is not considered to be accurate and should be removed from the draft Local Plan. Moreover, as stated above, the housing target of 411 new homes per annum is a minimum requirement and at risk of under-delivery due to an over-reliance on small housing sites and by adopting such a narrow</p>

		view as to the benefits of retained employment floorspace (whatever the case), rather than an assessment of site specific characteristics of that floorspace in question, and whether it could be repurposed for other more suitable and appropriate uses.
Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 10 New Housing	<p>Recommended Amendments</p> <p><u>Operating Period and the Housing Requirement</u></p> <p>In accordance with NPPF para 22, it is necessary for soundness that strategic policies cover the full plan period, which in this case is 15 years (the period is confirmed at para 2.1 of the draft Local Plan). Policy 10 is confirmed (in its heading) as a ‘Strategic Policy’ but only covers a period of 10 years. As a starting point, we recommend that this is amended to cover the full 15-year period of the plan in order to be consistent with national policy.</p> <p>In order to meet the overall housing requirement for the plan period as a whole, the 10 year housing target set by London Plan Policy H1 should be projected forward to cover the full 15 year period. Therefore we recommend that Policy 10 is amended to plan for a housing target of 6,165 homes in order to be consistent with national policy and in general conformity with the London Plan.</p> <p><u>Exceeding the Housing Target</u></p> <p>National planning policy (as expressed in NPPF para 60) is focussed on significantly boosting housing supply. London Plan Policy H1 sets minimum ‘targets’ for net housing completions which each local planning authority should plan for, and should be included in the Local Plan. The policy goes onto require boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites through their development plans (including through the mixed-use redevelopment of low-density retail parks).</p> <p>Part A of the Policy 10 confirms that the Council will ‘exceed the minimum strategic dwelling requirement’‘where this can be achieved in accordance with other Local Plan policies’. It is our view that this qualification is unnecessary and over cautious and that the policy overall should adopt a much more positive and ambitious approach to <u>significantly</u> boosting housing supply in the borough and optimising sites in order to accord with national policy and be in general conformity with the London Plan. This view is justified by the supply of deliverable/developable sites set out in chapters 6-14 of the Plan which appear (on the basis of our review) to have capacity to exceed the minimum 15-year target set by the London Plan on the basis of the evidence set out in the Council’s Urban Design Study (see below for further explanation).</p> <p><u>Housing Trajectory</u></p> <p>In order to be consistent with national policy (NPPF para 74), a housing trajectory should be prepared and included within the plan (to be read alongside Policy 10). This should be appropriately evidenced and consistent with the specific sites and broad locations for growth set out in Policy 10 itself and elsewhere in the Plan.</p> <p><u>Broad Locations for Growth</u></p> <p>NPPF para. 68 requires Local Plans to identify a supply of specific deliverable sites for years 1-5 of the plan period and specific developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. The draft Plan includes a series of place-based strategies with associated site allocations, each of which includes details of their expected implementation timescale (years 0-5, 5-10 or 10-15). We recommend amending these to years 1-5, 6-10, and 11-15 for the purposes of consistency with national policy.</p> <p>Part B of Policy 10 goes on to identify broad locations for growth based on wards. The use of wards is inconsistent with the place-based approach adopted by the first part of the plan. As a consequence it is not possible to effectively read/apply Policy 10 and the first part of the plan together (and therefore not possible to read the local plan ‘as a whole’) which is not in accordance with NPPF para 16(d). In order to be effective, the ‘areas’ referred to in Policy 10 should be amended to tally with the ‘places’ set out in Chapters 6-14 plan upon which the spatial strategy of the plan as a whole is based.</p> <p>Part B sets out a quantum of housing for each broad location. These are described as ‘indicative ranges’ and ‘approx’.). These terms are vague (not in accordance with NPPF para 16(d)) and do not firmly commit to delivering the minimum target set by London Plan Policy H1. To ensure accordance with national policy and conformity with the London Plan we recommend the figures stated should be ‘targets’ (with a clear intention to exceed – see below).</p> <p>In order to accord with national policy (NPPF para. 68), the ‘target’ amounts of new housing for each broad location set out in the table at Part B should be amended in order that they tally with the minimum 10-year housing target, and where possible the 15-year target. Our initial view is that the proposed site allocations set out in the draft plan indicate that the borough has an ample supply of specific deliverable/ developable sites to meet the 15-year housing target therefore we recommend that the amounts set out in the table at Part B of the Policy should cover the full 15-year period in order to accord with national policy and ensure soundness.</p> <p>No explanation is provided in the draft policy of how the actual amounts set for each location in the table have been calculated, therefore these are not clearly justified by evidence. Our review indicates that some of the figures may be under-ambitious when considered in conjunction with the proposed site allocations and recent planning permissions. If this is the case, it would fail to accord with the national policy requirement to significantly boost housing supply nor conform with the London Plan requirement to optimise sites. To ensure soundness (justified), the figures should be clearly evidenced and revised accordingly to reflect the evidence.</p> <p>To highlight this point, an indicative/approximate range of 1,100-1,200 homes has been identified for the ‘Richmond’ area. There are 6 sites allocated within this area with a total site area of 8.77ha. The optimum capacity of two of these sites (Kew Biothane and Homebase) has been confirmed via planning applications, with a combined capacity of 542 homes (average density of 214 dwellings per hectare (dph)). This leaves an ‘indicative’ balance of 558-658 homes for the remaining 4 allocated sites which would equate to an average density of 63-75dph. These density figures appear unrealistically low when considered in conjunction with the evidence set out in the Urban Design Study (2021) including the sites’ capacity for change and suitability for tall buildings.</p> <p>Refer to Table 8.1, below:</p>

		<p><i>Table 8.1 Review of Proposed Site Allocations in 'Richmond' Area</i></p> <table><tr><th>Site</th><th>Site Area</th><th>Site Capacity</th></tr><tr><td>Homebase Manor Road</td><td>1.84ha</td><td>453 homes (planning application ref. 19/0510 – approved by Mayor)</td></tr><tr><td>Kew Biothane</td><td>0.69ha</td><td>89 homes (planning permission ref. 18/3310)</td></tr><tr><td>Sub-total (known site capacity)</td><td>2.53ha</td><td>Actual capacity: 542 homes Average density = 214 dwellings per hectare</td></tr><tr><td colspan="3"></td></tr><tr><td>Richmond Station</td><td>1.96ha</td><td>Unknown Identified in UDS as tall building zone with appropriate building heights of 7-8 storeys</td></tr><tr><td>Richmond Telephone Exchange</td><td>0.27ha</td><td>Unknown</td></tr><tr><td>Sainsbury's, Lower Richmond Road</td><td>2.63ha</td><td>Unknown Identified in UDS as tall building zone with appropriate building heights of 7-8 storeys</td></tr><tr><td>Kew Retail Park</td><td>3.91ha</td><td>Unknown Identified in UDS as tall building zone with appropriate building heights of 7 storeys</td></tr><tr><td>Sub-total (unknown site capacity)</td><td>8.77ha</td><td>Indicative range (draft Policy 10): 558-658 homes Average density = 63-75 dwellings per hectare</td></tr></table> <p>In accordance with the above, our view is that the ‘approx. no. of units’ figures set out in Part B of Policy 10 appear too low (including specifically for the Richmond area) and should be increased to more accurately reflect the optimum capacity of sites within each area in order to be properly justified. The figures should be underpinned by evidence – SG and M&S propose to work with the Council to prepare the necessary evidence to determine the optimum capacity of the KRP site over the course of 2022 in advance of the preparation of the Regulation 19 draft.</p>	Site	Site Area	Site Capacity	Homebase Manor Road	1.84ha	453 homes (planning application ref. 19/0510 – approved by Mayor)	Kew Biothane	0.69ha	89 homes (planning permission ref. 18/3310)	Sub-total (known site capacity)	2.53ha	Actual capacity: 542 homes Average density = 214 dwellings per hectare				Richmond Station	1.96ha	Unknown Identified in UDS as tall building zone with appropriate building heights of 7-8 storeys	Richmond Telephone Exchange	0.27ha	Unknown	Sainsbury's, Lower Richmond Road	2.63ha	Unknown Identified in UDS as tall building zone with appropriate building heights of 7-8 storeys	Kew Retail Park	3.91ha	Unknown Identified in UDS as tall building zone with appropriate building heights of 7 storeys	Sub-total (unknown site capacity)	8.77ha	Indicative range (draft Policy 10): 558-658 homes Average density = 63-75 dwellings per hectare
Site	Site Area	Site Capacity																														
Homebase Manor Road	1.84ha	453 homes (planning application ref. 19/0510 – approved by Mayor)																														
Kew Biothane	0.69ha	89 homes (planning permission ref. 18/3310)																														
Sub-total (known site capacity)	2.53ha	Actual capacity: 542 homes Average density = 214 dwellings per hectare																														
Richmond Station	1.96ha	Unknown Identified in UDS as tall building zone with appropriate building heights of 7-8 storeys																														
Richmond Telephone Exchange	0.27ha	Unknown																														
Sainsbury's, Lower Richmond Road	2.63ha	Unknown Identified in UDS as tall building zone with appropriate building heights of 7-8 storeys																														
Kew Retail Park	3.91ha	Unknown Identified in UDS as tall building zone with appropriate building heights of 7 storeys																														
Sub-total (unknown site capacity)	8.77ha	Indicative range (draft Policy 10): 558-658 homes Average density = 63-75 dwellings per hectare																														
Alice Shackleton, on behalf of The Kew Society	Policy 10 New Housing (Strategic Policy)	17.7 This aspiration/target should not be able to override designation of protected open lands and should be consistent with the requirements of Conservation Areas. These lands and Conservation Areas should, in our view, be held by the present owners as trustees for future generations. Once gone for current short-term needs and perceived needs, they are gone forever.																														
Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Policy 10 New Housing, Paragraph 17.8	<p>Paragraph 17.8 relates to retaining land in employment use and states that "housing delivery against the borough target is capable of being met without the release of employment land, although there may be limited potential for enabling housing gain on employment land if proposals increase the level of existing floorspace".</p> <p>Suggested amendment:- It is considered that the following wording should be added to this paragraph to assist with housing delivery. "if proposals increase the level of existing floorspace OR the existing commercial floorspace is not viable".</p>																														
	Policy 11. Affordable Housing (Strategic Policy)																															
Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Policy 11: Affordable Housing	<p>This policy includes the increased percentage of affordable housing for former employment sites. This states that "on all former employment sites at least 50% on-site provision and where possible, a greater proportion than 50% AH on individual sites should be achieved". The Affordable Housing SPD makes reference at paragraph 2.8.6 that "for small sites where listed buildings are subject to conversion from employment to residential, as an exception the contribution sought will be discounted".</p> <p>Evidence:- The Affordable Housing SPD makes reference at paragraph 2.8.6 that "for small sites where listed buildings are subject to conversion from employment to residential, as an exception the contribution sought will be discounted".</p> <p>Suggested amendments:- The reference to listed buildings should be also referenced in the supporting paragraphs to draft Policy 11, for clarity.</p>																														
Tim Catchpole, Mortlake with East Sheen Society	Policy 11. Affordable Housing (Strategic Policy)	We are pleased to see a definition of affordable housing (not given in the current Local Plan). We note that the split is 70% social rent and 30% intermediate whereas it is currently 80% and 20% respectively, but there is no explanation given as to why this has changed.																														
Susan Norgan	General comments in relation to housing/affordable housing	<p>1. The general aims are worthy but the targets indicated for affordable homes appear highly optimistic.</p> <p>2. How will these be financed if developers find the profit margins unattractive?</p> <p>3. Will the current restrictions in Conservation Areas be respected?</p>																														
Ziyad Thomas, Planning Issues Ltd on behalf of Churchill Retirement Living and McCarthy Stone	Policy 11. Affordable Housing (Strategic Policy)	<p>Policy 11: Affordable Housing states that all new housing developments in the borough should provide at least 50 per cent of the total number of habitable rooms as affordable housing on site. This is a higher requirement than the strategic target of 50% of all new homes in London to be ‘genuinely affordable’ detailed in Policy H4: Delivering affordable housing of the London Plan. Moreover Paragraph 17.20 advises that the threshold approach in London Plan Policy H5: Threshold approach to applications is not applicable in the Borough as “Richmond’s affordable housing need is so great and the borough has such a limited supply of major sites, using the threshold approach would have a detrimental impact on the Council achieving its goal of providing 50% affordable housing across the borough.”</p> <p>Disappointingly the Regulation 18 consultation is not supported by a Local Plan Viability Assessment (LPVA) publicly available.</p>																														

		<p>In the first instance it is surprising that a Planning Authority would choose to publish a Local Plan without having ascertained that the policies within it are deliverable. Secondly by limiting scrutiny of the Local Plan Viability Assessment to the Regulation 19 consultation the Council is reducing the opportunities for comment on this, crucial, element of the evidence base. It is a less robust piece of evidence as a consequence.</p> <p>The PPG makes it clear that Local Plan process is a collaborative process stating that ‘It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers (Paragraph: 002 Reference ID: 10-002-20190509). By limiting the opportunities for comment of the Local Plan Viability Assessment we are of the view that the Council has deviated substantially from national guidance and this could subsequently undermine the soundness of the Plan.</p> <p>It is our view that the Council should reconsult on the (Regulation 18) Local Plan with the supporting Local Plan Viability Assessment made publicly available for comment at the same time.</p> <p>We would also like to respectfully remind the Council that the viability of specialist older persons’ housing is more finely balanced than ‘general needs’ housing and the respondents are strongly of the view that these housing typologies should be robustly assessed in the LPVA. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. “A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.</p> <p>The Local Plan is therefore considered to be unsound on the grounds the affordable housing targets are not justified, positively prepared or effective.</p> <p>Changes considered necessary:</p> <p>The Regulation 18 consultation is not supported by a Local Plan Viability Assessment (LPVA) publicly available.</p> <p>In the first instance it is surprising that a Planning Authority would choose to publish a Local Plan without having ascertained that the policies within it are deliverable. Secondly by limiting scrutiny of the Local Plan Viability Assessment to the Regulation 19 consultation the Council is reducing the opportunities for comment on this, crucial, element of the evidence base. It is a less robust piece of evidence as a consequence.</p> <p>The PPG makes it clear that Local Plan process is a collaborative process stating that ‘It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers (Paragraph: 002 Reference ID: 10-002-20190509). By limiting the opportunities for comment of the Local Plan Viability Assessment we are of the view that the Council has deviated substantially from national guidance and this could subsequently undermine the soundness of the Plan.</p> <p>It is our view that the Council should reconsult on the (Regulation 18) Local Plan with the supporting Local Plan Viability Assessment made publicly available for comment at the same time.</p>
Luke Burroughs, Transport for London (TfL) Commercial Development	Policy 11. Affordable Housing (Strategic Policy)	<p>Policy 11: Affordable Housing TfL CD welcomes the policy that developments “<i>should provide 50 per cent of the total number of habitable rooms as affordable housing on site</i>”. TfL Property Development is committed to delivering 50 % affordable housing (by habitable room) across its portfolio as instructed by the Mayor. TfL have significant land holdings in the borough and look forward to working collaboratively with Islington to deliver affordable housing on appropriate sites within our ownership, in line with DLP policy H5 delivering affordable housing.</p> <p>However, policy H4 of the London Plan identifies that public sector landowners with agreements with the Mayor can take a portfolio across to delivering 50% affordable housing across public landholdings in London. TfL has such an agreement with the Mayor which provides the flexibility for more complex sites to come forward where they would be unviable providing the full 50% affordable housing requirement, whilst still providing a high level of affordable housing across all TfL landholdings. This policy should be updated to reflect the wording of London Plan policy H4 on portfolio agreements for public sector landholders.</p>
James Sheppard, CBRE, on behalf of LGC Ltd	Policy 11. Affordable Housing (Strategic Policy)	<p>5. Affordable Homes</p> <p>The adopted London Plan (March 2021) provides for a housing land supply requirement for LBRuT of 4,110 completions over a 10-year period. At a strategic level, the London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes across London per annum. Indicative ranges have been included in draft Policy 10 in a range of broad areas. Within ‘Teddington and the Hamptons’, a range of 900 – 1,000 new homes have been stated.</p> <p>Notwithstanding paragraph 17.5 of the draft Local Plan that summarises the findings of the latest housing Annual Monitoring Report (November 2020), setting out that the borough is forecast to meet the strategic dwelling requirement over a ten-year period, LBRuT continues to suffer from a fundamental and longstanding under provision of affordable homes.</p> <p>To successfully meet the Council’s draft strategic vision every avenue should be explored to ensure the delivery of these affordable homes. The Council sets out in its strategic vision that by 2039, residents will have seen the impact of delivering new homes and an affordable borough for all, with a range of affordable housing having been delivered, with a future pipeline, supporting low- and middle-income residents and workers into low-cost rent and home ownership options. Specifically, targeted strategic objectives include the “maximisation of delivery of genuinely affordable housing across the borough through a range of measures, recognising the significant community benefits as a priority, and taking innovative and flexible approaches to deliver more affordable housing to meet the needs of Richmond’s residents”.</p> <p>London plan Policy H1 sets out a range of measures that should be adopted to ensure housing targets are achieved, including for boroughs to “allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification”. This is considered pertinent to the Council’s significant affordable housing deficit. Policy H1 goes on to require boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites through Development Plans, especially through sites with PTALS 3-6, or within 800m of a station or town centre boundary, and on industrial sites that have been identified through the processes as set out in Policies E4, E6 and E7. The potential of co-location of uses through Policy E7 has been explored above.</p> <p>Paragraph 17.12 confirms the borough’s affordable housing delivery challenge, stating “due to the scarcity of land in the borough and other factors it is now experiencing an acute affordable housing crisis. Not enough affordable housing is being built to help alleviate the ever-growing need. Therefore, the Council will do everything in its power to make sure over the plan period we hit the 50 per cent target”.</p> <p>It follows therefore, that every possible option should be explored to ensure affordable homes are provided. This should include for a balanced approach to mixed-use development, whilst ensuring no-net loss of employment floorspace, as prescribed in policies 21, 23 and 24. Paragraph 17.14 illustrates the strength of need still further by stating “the need for affordable housing in the borough is demonstrable, which has been evidenced by the Council’s Local Housing Need Assessment 2021 (LHNA). The LHNA estimates a net annual need of 1,123 affordable rented and 552 home ownership products to be provided between 2021-2039. This is significantly higher than Richmond’s overall annual housing target of 411 homes per annum during the current London Plan period (2019-2041)”. Paragraph 4.4.5 of the London Plan 2021 confirms that the London SHMA identifies that 65 per cent of London’s need is for affordable housing.</p> <p>There is clearly a critical, pressing need for delivery of affordable homes in the borough, to provide for the housing needs of residents and communities within Teddington, wider Richmond and Greater London.</p> <p>One of the key issues that will serve to stifle future affordable housing delivery is that a such a large proportion of the Council’s forecast housing delivery stems from the delivery of small sites. The London Plan Table 4.2 confirms the large proportion of Richmond’s 10-year housing target predicated on net housing completions on small sites as being 2,340. Affordable housing is very often difficult to provide on-site, as part of small site development. This often manifests in Payments in Lieu (PiL). Given the lack of available land to develop new affordable housing, PiL cannot easily and readily contribute to relieving the affordable housing crisis. The comprehensive development of larger sites is a tangible and effective way of delivering on site affordable housing, in locations where affordable housing is most needed. The risk of such a reliance on small sites and PiL, is that this is far less effective than providing strong provision, ‘on mass’, as part of larger site redevelopment.</p>

		<p>In addition, importantly, paragraph 17.8 of the draft Local Plan notes there is a need to retain land in employment use but goes on to concede that “there may be limited potential for enabling housing gain on employment land if proposals increase the level of existing employment floorspace”.</p> <p>The site has the potential to offer a policy compliant level of affordable housing, which for employment sites is considered to be 50%, despite there being no proposed loss of industrial capacity on site.</p> <p>Boroughs should be identifying and seeking to enable additional development capacity to supplement targets, thereby realising the true potential of brownfield housing capacity. The adopted London Plan makes it clear that making the best use of land means directing growth towards the most accessible and well-connected places. Policy GG2 of the London Plan 2021 specifically directs the proactive exploration of potential to intensify the use of land to support additional homes and workspaces. This would involve the promotion of higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.</p>
Anna Russell-Smith, Montagu Evans on behalf of South West London and St George’s Mental Health NHS Trust	Policy 11. Affordable Housing (Strategic Policy)	Emerging Policy 11 (Affordable Housing - Strategic Policy) Part F states ‘Site specific viability information will only be accepted in exceptional cases, determined by the Council’. In line with NPPF paragraph 58 and London Plan viability should be required where schemes do not meet the threshold.
Nina Miles, GLA on behalf of Mayor of London	Policy 11. Affordable Housing (Strategic Policy)	<p>We welcome Richmond’s intention to seek 50% affordable housing from residential development. However, the Mayor has set out a Threshold Approach to affordable housing delivery in Policy H5 LP2021, which is not reflected in the plan. This is likely to constitute a General Conformity Issue.</p> <p>The Threshold Approach seeks to limit those circumstances where viability evidence is required as part of residential planning proposals by providing the incentive for developers to achieve at least the minimum level of affordable housing to qualify for the Fast Track Route thereby avoiding scrutiny of viability at various stages of development. This should be reflected in Richmond’s strategic affordable housing policy.</p> <p>Affordable housing data from London Plan AMR shows Richmond as having an average of 14% completions over the three years 2016/17 to 2018/19 and -3% for approvals in 2018/19 (although this rises to 0% when counted by number of bedrooms). Therefore, the Mayor cannot currently support Richmond’s approach to affordable housing contributions, particularly when this is not supported by viability evidence or historical delivery rates.</p>
Neil Henderson, Gerald Eve on behalf of Reselton Properties	Policy 11 Affordable Housing	Policy 11, Sub Section D - Reselton welcome a balance which provides greater weight to intermediate tenure (70:30). A greater proportion of intermediate housing can often make a significant difference to the viability of a development. For example, a policy compliant approach of 70:30 may only be able to deliver 100 units of affordable housing. However, significantly increasing the proportion of intermediate to, say, 50:50, may result in a significant increase in affordable units overall e.g 140 units. This has the potential to deliver no less social rented housing but significantly more affordable housing overall. As a result it is considered there should be flexibility in the policy to allow for different tenure splits where the outcome delivers broadly the same social rent quantum but allows for a significantly greater quantum of affordable housing overall.
Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 11 - Affordable Housing	<p>The draft policy indicates that all developments should deliver at least 50 per cent of the total number of habitable rooms as affordable housing on site. The policy also notes that at least 50 per cent on-site provision should be provided for all former employment sites and where possible a greater proportion than 50 per cent affordable housing on individual sites should be achieved. This draft policy is in conflict with the London Plan, where Policy H5 allows for the Threshold approach to be followed for sites which deliver a minimum of 35 per cent affordable housing, or 50 per cent for public sector or industrial land. Sites which deliver the threshold level of affordable housing would be fast-tracked through the system and would not be required to provide a viability assessment. Draft Local Plan Policy 11, is clearly contrary to this since it requires a minimum of 50% affordable housing across all sites and applies a late stage review where developments for over ten homes are permitted with less than 50% affordable. Part F also states that “<i>Site-specific viability information will only be accepted in exceptional cases</i>”. We consider this policy to be overly vague and does not provide sufficient detail to future applicants to understand how their applications would be dealt with by the Council. The Council should provide an indication of what scenarios fall into ‘exceptional circumstances’ so that developers can rely on a consistent approach across the borough.</p> <p>Furthermore, Part F is also contrary to the London Plan and paragraph 124 of the NPPF which recognises that planning policies and decisions should take account of “<i>local market conditions and viability</i>” among other site considerations. Site specific circumstances should therefore be taken into account through the Viability Tested Route. This is particularly pertinent to former industrial sites such as the Greggs bakery which present high costs associated with decontamination and asbestos removal which have been found within a number of buildings present on the Site. We therefore call for the re-wording of draft Policy 11 to replicate the affordable housing threshold approach in the London Plan and delete part F of draft Policy 11.</p> <p>The AMR (2019/2020) sets out that only 34 new affordable units were delivered in 2019/20 across the whole borough. The Local Housing Needs Assessment estimates a net annual need of 1,123 affordable rented and 552 affordable home ownership products to be provided between 2021-2039. This is significantly higher than Richmond’s overall annual housing target of 411 homes per annum during the current London Plan period (2019-2041). It is questioned how the borough intends to deliver the additional affordable housing requirements which exceed their housing targets, and invalidates the Council’s assertion that the borough can meet its housing need without the release of employment land, given the historical under-delivery of affordable housing within the borough.</p> <p>Furthermore, given the low number of affordable homes delivered within the borough, the Council need to also consider their role in bringing forward viable schemes through a careful assessment of Policy 11 and wider Local Plan policies. Given the historical challenges, the Council should not simply set a blanket ‘50% or nothing’ approach and Policy 11 should allow for a viability tested approach (should the affordable housing thresholds not be met) in order to increase affordable housing delivery in line with London Plan (2021) policy.</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 11. Affordable Housing (Strategic Policy)	<p>We support the policy. However, we note in paragraph 17.21 that the Council will pursue a different tenure split to the London Plan (Policy H6) in favour of affordable rent over intermediate housing products. The London Plan policy allows for flexibility to explore innovative affordable housing products to meet local housing needs.</p> <p>It is recognised that the shortage of affordable housing in London is hindering the recruitment and retention of public service workers. The National Planning Policy Framework definition of affordable housing (Annex 2) includes housing for sale or rent for essential local workers, which includes NHS staff.</p> <p>The redevelopment of surplus public sector land and buildings represents an opportunity to deliver homes that can meet the needs of essential workers and such provision could be part of the overall requirement for at least 50% affordable housing on site.</p>

<p>Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer</p>	<p>Policy 11 Affordable Housing</p>	<div data-bbox="1047 195 2113 531"> <p>Definition of Affordable Housing</p> <p>Annex 2 of the NPPF defines Affordable Housing for planning purposes. Genuinely Affordable Housing. The Council considers the following to be genuinely affordable housing products to be as per the definition set out in London Plan Policy H4:</p> <ul style="list-style-type: none"> — Social Rent — London Affordable Rent — London Living Rent (only when delivered in compliance with the Council's Intermediate Housing Policy Statement 2019 or any further update.) — Shared Ownership (only when delivered in compliance with the Council's Intermediate Housing Policy Statement 2019 or any further update.) </div> <div data-bbox="1047 562 2086 1591"> <p>Policy</p> <p>A. All new housing developments in the borough should provide affordable housing in accordance with London Plan Policies H4 to H6, at least 50 per cent of the total number of habitable rooms as affordable housing on site. The affordable housing being provided should be genuinely affordable for the majority of residents in the borough.</p> <p>B. A contribution towards affordable housing will be expected on all housing sites. The following requirements apply:</p> <p>C. on all former employment sites at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.</p> <p>D. on all other sites capable of ten or more units gross 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved,</p> <p style="padding-left: 40px;">on sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out below and in the Affordable Housing SPD</p> <p>C. Where on site provision is required, an application should be accompanied by evidence of meaningful discussions with a Registered Provider which have informed the proposed tenure, size of units and design to address local priorities and explored funding opportunities.</p> <p>D. Where on-site affordable housing is provided on site, the Council will require an affordable housing tenure split of 70% low-cost rented homes affordable rented housing and 30% intermediate housing (as per London Plan definitions) by habitable room. The intermediate housing will be delivered in line with the Council's Intermediate Housing Policy Statement.</p> <p>E. If the minimum level of affordable housing is not provided in line with Part B (1) and B(2) the application for development will be refused.</p> <p>F. Site specific viability information will only be accepted in exceptional cases, determined by the Council. Any proposals where site specific viability evidence is accepted must provide the maximum amount of affordable housing, informed by detailed viability evidence. The cost of any independent review must be covered by the applicant.</p> <p>G. If a site proposes a non-compliant level of affordable housing and is granted permission it will be subject to detailed review mechanisms throughout the period up to full completion of the development, including an advanced stage review mechanism. Sites that meet the 50% target for affordable housing will not be subject to a late stage review, only an early stage review to incentivise implementation.</p> <p>H. In exceptional circumstances, where affordable housing cannot practically be provided on site, or off-site provision would create a better contribution (in terms of quantity and/or quality), the Council may accept provision of affordable housing off-site in the same area.</p> </div> <div data-bbox="1047 1612 2086 1833"> <p>I. Developments involving the provision of affordable housing will be expected to achieve the same high quality standards as the private housing element of the scheme in terms of accessibility, internal space requirements, external appearance and design quality and provision of private outdoor space.</p> <p>J. The Council will not accept the net loss of any existing affordable housing and will expect any estate regeneration to provide the equivalent amount of affordable housing by habitable room, and where possible, achieve an uplift in provision.</p> </div>
---	-------------------------------------	--

Explanation/Justification
Definitions

		<p>The definition of affordable housing set out in the orange box after para 17.11 is muddled which means it is not effective and not in accordance with NPPF para 16(d). There are two separate matters here: (1) a definition of affordable housing; and (2) a definition of what the Council considers to be ‘genuinely’ affordable housing.</p> <p><i>Definition of Affordable Housing</i></p> <p>‘Affordable Housing’ for planning purposes is defined at NPPF Annex 2. This is reiterated at footnote 53 of the London Plan. The definition set out in the orange box is not consistent with this and therefore is not in accordance with national planning policy nor in general conformity with the London Plan. We recommend that the text should be amended in order that it is based on the NPPF definition (there is no need to duplicate – a cross reference will suffice).</p> <p><i>Definition of ‘Genuinely Affordable Housing’</i></p> <p>NPPF para. 63 allows the Local Plan to specify the ‘type’ of affordable housing required within the parameters of the definition provided at Annex 2. Accordingly, the orange box after para 17.11 provides a definition of what the Council considers to be ‘genuinely’ affordable housing, which comprises 4 acceptable types of affordable housing required by the policy. Part A of the policy introduces a further qualifying requirement that the affordable housing provided should be genuinely affordable for the ‘majority of residents in the borough’. The supporting text at paragraph 17.18 goes on to provide a broader explanation which is not consistent with the orange box nor the policy wording, including the statement that ‘genuinely affordable housing is primarily considered to be homes rented at either social rent or London Affordable Rent levels’ (only). When read as a whole, the definition is not properly justified nor clear therefore is not in accordance with national planning policy nor in conformity with the London Plan.</p> <p>The London Plan identifies ‘preferred’ affordable tenures at para 4.6.3-9, which are products that the Mayor considers to be genuinely affordable. This comprises London Affordable Rent (LAR), Social Rent (SR), London Living Rent (LLR), and London Shared Ownership (LSO). As a starting point, the type of affordable housing required by the policy (i.e. that identified as being ‘genuinely affordable’) should conform with the preferred affordable housing tenures set out in the London Plan.</p> <p>The inclusion of Social Rent and London Affordable Rent (LAR) within the definition in the orange box conforms with the London Plan and is sound in principle. However, to ensure effectiveness and having regard to NPPF para 16(d) we recommend that the supporting text refers to the London Plan definitions for these products. Paragraph 17.18 deviates from the orange box by stating that LAR is only acceptable if evidence is provided that it will be affordable to the majority of residents living in the borough. This qualifier is not in conformity with the London Plan (which establishes as a matter of established planning principle that LAR is a genuinely affordable product) and therefore is unsound.</p> <p>The supporting text at paragraph 17.18 states that ‘In the context of the Local Plan, genuinely affordable housing is primarily considered to be homes rented at either social rent or London Affordable Rent levels’. This is not sound on the basis of non-conformity with the London Plan which establishes the principle that LLR and LSO products also meet the definition of genuinely affordable.</p> <p>The intermediate products (LLR and Shared Ownership) included within the definition in the orange box are not sound on procedural terms and on the grounds of non-conformity with the London Plan. This is principally due to the qualification: ‘only when delivered in compliance with the Council’s Intermediate Housing Policy Statement 2019 or any further update’ (this also applies to Part D of the policy).</p> <p>- The Local Plan must be capable of operating as a standalone document (with the exception of making reference to the NPPF and/or London Plan). It follows that it is not capable of being sound if its policies are subject to materially significant content set out in a separate existing statement that does not form part of the development plan (or Government policy) and therefore has not been subject to independent examination to ensure its soundness.</p> <p>- The Council’s Intermediate Housing Policy Statement (2019) does not form part of the Council’s evidence base being consulted on (as part of the Regulation 18 consultation) nor was it available for public download from the Council’s website during the reg.18 consultation period. Accordingly, and notwithstanding the above point, it is not possible to for the public to reach a judgement on whether its content is sound or not.</p> <p>There is no definition for the ‘Shared Ownership’ product. We recommend that this is amended to ‘LSO’ with reference made to the London Plan for LSO and LLR definitions.</p> <p>The relevant evidence that is currently available comprises the Richmond Local Housing Market Assessment (2021), however this does not justify deviating from the London Plan and/or national policy in respect to the soundness issues set out above. Accordingly, in order to make the plan sound we recommend amending the orange box, the policy wording, and paragraph 17.18 in order that the definitions of ‘affordable housing’ and ‘genuinely affordable housing’ are in full conformity with the London Plan. There is no need to duplicate text, amending the wording to simply cross-refer to the London Plan will suffice to make the plan sound.</p> <p><u>50% Minimum Affordable Housing Requirement</u></p> <p>The combined requirement of Parts A, B(1) and B(2) of the policy require a minimum 50% affordable housing to be provided.</p> <p>As a starting point, NPPF para 62 establishes the principle that affordable housing needs should be reflected in Local Plan policies. The London Plan sets a strategic target that 50% of all new homes across London should be affordable, with affordable housing provided through the threshold approach (Policies H4 and H5).</p> <p>NPPF para 16(b) requires local plans to be deliverable. Satisfying this requirement in the context of setting affordable housing policies is dependent on evidence set out in a Whole Plan Viability Assessment. The Viability PPG states that: ‘The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.’ 002 Reference ID: 10-002-20190509</p> <p>As confirmed in the supporting text to the policy, the Council has not yet undertaken a Whole Plan Viability Assessment. Accordingly there is no evidence base to confirm whether the 50% requirement is viable (and therefore deliverable) and it is therefore fundamentally unsound (not positively prepared, not justified, not effective, and not consistent with national policy).</p> <p>The plan can be made sound through the preparation of a Whole Plan Viability Assessment and subsequent amendments to accord with its conclusions. Until and unless such evidence is prepared that justifies deviating from the threshold approach set out in the London Plan, we recommend that the policy should be amended to fully conform with the London Plan.</p> <p><u>Whole Plan Viability Assessment</u></p> <p>In order to provide a robust evidence base to underpin the policy it is essential that the Whole Plan Viability Assessment fully accounts for the broad range of site-specific considerations that effect the viability of development in the borough. This is particularly important for the proposed site allocations, upon which the deliverability of the plan rests.</p> <p>To illustrate the point, Kew Retail Park is not a ‘typical’ site typology as it is a successful retail destination with an inherently high existing use value. This means that viability is going to be more challenged here than on other brownfield sites where commercial uses may be redundant and/or existing use values lower.</p> <p>Subject to the findings of the evidence, it may well be necessary for the policy to set different affordable housing targets at different locations and sites, as supported by the Viability PPG: ‘Different requirements may be set for different types or location of site or types of development.’ Paragraph: 001 Reference ID: 10-001-20190509. This is consistent with London Plan Policy H4 which recognises that the 50% target is a strategic London wide target that will not be achievable in all cases, particularly if additional funding is not available.</p> <p><u>The Threshold Approach</u></p> <p>The threshold approach was introduced in supplementary planning guidance by the Mayor in 2017 as a solution to address the failings of past policy approaches which have failed to deliver adequate levels of affordable housing to meet the needs of Londoners. The guidance was subsequently established as policy in the new London Plan. Evidence indicates that the shift to the threshold approach has been effective, with the average proportion of affordable housing secured under new planning permissions granted increasing significantly since the approach was introduced. Table 9.1, below, sets out the proportion of affordable housing provided within GLA referable applications (resolution to grant or approved) across London over the period 2011-2020. This demonstrates a clear increase in affordable housing commitments secured following the introduction of the threshold approach in 2017.</p>
--	--	---

Table 9.1 – Affordable Housing Commitments (all London) 2011-20

Year	Total Homes	Affordable Homes	% Affordable
2011	29,120	6,900	24%
2012	52,932	13,068	25%
2013	40,058	9,863	25%
2014	44,982	10,026	22%
2015	53,425	13,929	26%
2016	34,807	8,606	25%
2017	23,784	6,188	26%
2018	42,762	14,141	33%
2019	29,631	10,935	37%
2020	38,865	14,337	37%
Total	390,366	107,993	27.7%

Source: Affordable Housing Planning Analysis Referable Applications, GLA, 2021

The current Richmond Local Plan requires 50% of all housing units to be affordable. Table 9.2, below, sets out the proportion of affordable housing that this policy approach has historically delivered:

Table 9.2 – Affordable Housing Completions (LBRuT) (2010/11 to 2019/20)

Year	Total Homes	Affordable Homes	% Affordable
2010/11	399	126	32%
2011/12	208	75	36%
2012/13	695	227	33%
2013/14	235	33	14%
2014/15	304	6	2%
2015/16	491	99	20%
2016/17	460	62	13%
2017/18	382	41	11%
2018/19	419	70	17%
2019/20	331	34	10%
Total	3,924	773	19.7%

Source: London Borough of Richmond upon Thames Local Plan Authority Monitoring Report – Housing (2020)

The data set out in the above table demonstrates that in practice the policy approach set out in the current local plan has not delivered the amount or proportion of affordable homes that it intended. The need to increase the actual and proportional amount of affordable housing in the borough is highlighted in the Local Housing Market Assessment (2021) and reflected in the ambition of the draft new local plan policy. However, we are concerned that despite the evidenced success of the Mayor’s threshold approach in increasing affordable housing supply across London, the supporting text of the draft Local Plan (para 17.20) dismisses this as a mechanism to boost affordable housing supply in the borough, and instead proposes to continue with the previous policy approach of a 50% requirement which, despite best intentions, hasn’t been effective in the past.

The historic trend-based evidence firmly indicates that 50% affordable housing is unlikely to be deliverable and the Local Housing Market Assessment (2021) does not justify continuing with the current approach. Accordingly, we consider there to be no justification for deviating from the threshold approach set out in the London Plan.

Furthermore, setting an absolute 50% affordable housing target poses a risk to total new housing delivery in the borough as developers will focus upon areas where the threshold approach is valid and reasonable viability cases can be made.

On this basis, we consider the overall approach of the policy to be unsound on the grounds of nonconformity with the London Plan. It can be made sound by amending the policy to fully conform with London Plan Policy H5.

Application Stage Viability

In addition to the in-principle soundness issue regarding the threshold approach (as set out above) there are a number of further soundness issues with the proposed approach to the matter of viability at the planning application stage.

Part E states that if the minimum level of affordable housing is not provided the application will be refused. When read in isolation this allows no opportunity for a viability case to be progressed. This is inconsistent with Parts F and G of the policy and therefore is not in accordance with NPPF para 16(d). This point could be rectified by amending the text to add ‘subject to Parts F and G’.

Part F states that site specific viability information will only be accepted in exceptional circumstances. The supporting text (including para. 17.22) goes onto state that viability arguments will only be accepted in extraordinary circumstances. This is clearly not in general conformity with London Plan threshold approach and Policies H4-6 and, in the absence of evidence to robustly justify nonconformity, is not sound.

Viability Reviews

		<p>The requirements of Part G of the policy are not entirely consistent with London Plan Policy H5 which risks creating confusion for applicants and decision-makers, and conflicts with NPPF para 16(d). We recommend that it is amended to fully conform with London Plan Policy H5 to ensure soundness.</p> <p><u>Provision to be Informed by Meaningful Discussions with RPs</u></p> <p>The Viability PPG states that plan makers should engage with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage.</p> <p>This exercise should therefore be taken at the Plan making stage by the Council to inform the area wide viability assessment. The RPs requirements may not be in alignment with the Council’s currently stated targets and there may not be appropriate demand from RPs for the tenures and split indicated. It is not disputed that engagement with RPs is desirable at an early stage but this can only be effective if there is flexibility within the affordable housing policies for both developer’s and RPs to respond to housing need and viability constraints on different sites across the Borough.</p> <p><u>70:30 Ratio for Affordable Rented and Intermediate Housing</u></p> <p>The proposed 70:30 split accords with the parameters set by London Plan Policy H6, however in the absence of a Whole Plan Viability Appraisal there is no evidence to confirm whether this is viable (deliverable). It is therefore unsound. The necessary evidence will need to be prepared and the policy updated to reflect its conclusions in order to ensure soundness.</p> <p>Paragraph 4.6.2 in support of Policy H6 of the London Plan states that: There is a presumption that the 40 per cent to be decided by the borough will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London. However, it is recognised that for some boroughs a broader mix of affordable housing tenures will be more appropriate either because of viability constraints or because they would deliver a more mixed and inclusive community. The appropriate tenure split should be determined through the Development Plan process or through supplementary guidance.</p>
Catherine Rostron	Paragraph 17.14	<p>Affordable housing I would support the policy of providing social housing at truly ‘affordable rents’ rather than affordability being based on a percentage of actual private rents.</p> <p>Is there any scope for LBRUT funding additional social housing provision through investment constructs such as Model Dwelling Companies offering fixed rate returns on investments.</p>
Jon Rowles	Policy 11. Affordable Housing	<p>Definitions for affordable housing needs to have alms-houses added. For some reason, LBRuT planners refuse to accept its affordable housing whilst at a national level the Government is handing out affordable housing grants to almshouse charities.</p>
James Stevens, Home Builders Federation (HBF)	Definition for Affordable Housing (page 173)	<p>The definition excludes First Homes. We acknowledge that the London Plan makes no reference to First Homes. In part this is because the Plan was developed and adopted before the details of the Government’s First Homes initiative were published, but also because it is not a tenure/product that the Mayor supports. Nevertheless, the Council should give consideration to allowing First Homes to form an element of the affordable housing supply.</p>
James Stevens, Home Builders Federation (HBF)	Affordable housing contributions from small sites	<p>Contrary to national policy, the Council intends to levy contributions to the affordable housing fund from schemes of all sizes.</p> <p>The purpose of the Government’s introduction of the relief from affordable housing contributions is to support the establishment and growth of SME developers. An increase in the number of SME developers operating across London is critical to increasing housing supply across London and achieving the London Plan targets. The London Plan at paragraph 4.2.1 establishes this as a strategic priority. As it states:</p> <p><i>For London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small sites is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.</i></p> <p>The Council should lift this requirement from small developments. This is necessary to make the planning application process easier and to help with viability issues.</p>
Juliet Ames-Lewis, The Richmond Charities	17.27; 17.28 - Delivering New Homes and Affordable Housing For All	<p>17.27;17.28 - Delivering new homes and affordable housing for all. As the main provider of almshouse accommodation for the elderly in the Richmond borough (145 almshouses), The Richmond Charities is pleased to see that almshouses are acknowledged as an important part of providing a wide range and variety of different types of accommodation in the borough. We look forward to continuing to work with the Council in order to deliver new almshouse developments as we have been doing in recent years. We are recognised as an affordable housing provider and therefore we would like the Council to reconsider its requirement for 100% nomination rights on developments of over 10 units. The Richmond Charities houses elderly people in housing need and financial need and Trustees must retain the ability as specified in its governing document to decide who to house in line with the charity's criteria for residency.</p>
Anna Stott, WSP on behalf of Sainsbury’s	Policy 11. Affordable Housing, Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton	<p>[See comment against Site Allocation 5 in relation to the exceptional circumstances for the removal of the site from MOL]</p>
Robert Blakebrough	Policy 11. Affordable Housing	<p>[See comment in relation to affordable housing in Teddington]</p>
	Policy 12. Housing Needs of Different Groups	
Ziyad Thomas, Planning Issues Ltd on behalf of Churchill Retirement Living and McCarthy Stone	Policy 12. Housing Needs of Different Groups	<p>McCarthy Stone and Churchill Retirement Living are independent and competing housebuilders specialising in Retirement Living housing housing for older people. Together, we are responsible for delivering approximately 90% of England’s specialist owner-occupied retirement housing.</p> <p>Paragraph 1 of the PPG Housing for Older and Disabled people states:</p> <p>“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking”.</p> <p>Paragraph: 001 Reference ID: 63-001-20190626</p> <p>To that end we support the inclusion of sub-clause 4. which states that:</p> <p>4. Proposals for supported housing will be supported where they have been designed to meet identified local needs and are in accordance with the Council’s housing and commissioning strategies and London Plan Policy H12. Proposals should demonstrate how the design will address the level of support needed for future residents and be informed by discussions with providers and demonstrate accordance with the Council’s commissioning and housing strategies.</p> <p>The need for specialist older persons’ housing across Greater London is detailed in Table 4.3 of the London Plan which requires the Borough 155 units of specialist older persons’ accommodation per annum.</p> <p>Richmond’s Annual Monitoring Reports (AMR) do not currently monitor the delivery of specialist older persons’ housing in the Borough. The Knight Frank Senior Housing Update 2021 is however a useful reference in this respect and highlights the London Plan target for an additional 4,115 units of specialist older persons’ housing per year across the capital up to 2029. Since the start of the London Plan timeline in 2017 however, only 3,000 seniors housing units have been delivered – less than the requirement for one year. There are a further 1,600 further units either under construction or with planning granted across Greater London, which will do little to address the shortfall.</p> <p>In light of the urgent need to significantly increase the delivery of specialist older persons’ housing in the Borough and across Greater London, we consider that it is imperative that the planning policy framework does not impede the delivery of these forms of accommodation.</p> <p>We therefore question the requirement to demonstrate local need when the need for the specialist older persons’ housing is critical and self-evident.</p>

Nina Miles, GLA on behalf of Mayor of London	Policy 12 - Housing Needs of Different Groups	<p>We support Policy 12 that seeks to assess applications for older person’s housing in accordance with London Plan Policy H13. However, we note that the policy refers to identified local need as set out in the Council’s Local Housing Needs Assessment. This currently appears to be lower than the London Plan annual benchmark for older persons housing set out in Table 4.3 of 155 units for Richmond. We would welcome further review of this figure to bring it closer in line with the London Plan benchmark.</p> <p>Gypsy and Traveller accommodation Richmond’s own research on Gypsies and Travellers in 2013 and 2015 (report published in 2016) suggested that there is no demonstrated need for additional pitches, however the 10-year pitch requirement needs to be set out once the research is updated in 2022 and this should take Policy H14 LP2021 into account. We welcome the reference to the Mayor’s future London-wide Gypsy and Traveller accommodation needs assessment.</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 12. Housing Needs of Different Groups	<p>The CCG welcomes this policy which supports the need to provide a wider range of housing options for older people, reducing a reliance on residential care homes to enable people to live more independent lives for longer. It should be recognised that an increase in homes which support people with complex and nursing care needs will support a shift in healthcare ‘closer to home’ and reduce pressure on hospital services. A concentration of specific types of accommodation, such as residential care beds can place an additional burden on local health and care services. It should also be recognised that other forms of accommodation such as student accommodation and shared living will place pressure on local healthcare services and infrastructure and may require mitigation in the form of developer contributions.</p>
Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 12 Housing Needs of Different Groups	<p>Recommended Amendments and Explanation The wording in Parts A and B of the policy indicates that the policy applies to proposals for new ‘housing’ and/or ‘accommodation’. Neither term is defined and the initial paragraphs of the supporting text implies that the policy applies to specialist forms of housing only. On the whole it is not clear. This is not sound having regard to NPPF para 16(d) (accordance with national policy). We recommend that the policy is amended to make it explicitly clear what type of residential development it applies to. Part B of the policy states that ‘a legal agreement will be necessary to secure the nature of provision and any necessary future control in terms of eligibility and affordability for future occupiers’. The use of planning obligations is controlled by Regulation 122(2) of the Community Infrastructure Levy Regulations, with the relevant tests reiterated at NPPF paragraph 57. Whether or not a planning obligation can justifiably be sought for the nature of provision and/or control the eligibility and affordability of future occupiers will need to be judged on a case-by-case basis having regard to these tests. A blanket mandatory policy requirement that applies to all residential development would not satisfy these tests and therefore would not be in accordance with national policy, and therefore not sound. We recommend that the text is amended to replace ‘will be necessary’ with ‘may be necessary’ to resolve this. Part B(1) duplicates Policy 11 which is unnecessary in the context of NPPF para 16(f) (not in accordance with national policy). We recommend that this is deleted. Part B(2) requires proposals to demonstrate how ‘higher’ standards of accessible and inclusive design have been met. The term ‘higher’ is not defined therefore the requirement of the policy is not clear. This is not sound having regard to NPPF para 16(d) (not in accordance with national policy). We recommend that the policy is amended to make it explicitly clear what standards of accessible and inclusive design are required. We note that the required standards would need to accord with NPPF para. 35, and we reserve the opportunity to make further representations on this matter at the Regulations 19 stage.</p>
Heather Mathew, Richmond Council for Voluntary Service (CVS)	Pg 178 The housing needs of different groups.	<p>Pg 178 The housing needs of different groups. In the LBRUT Learning Disability Strategy 2015 – 20, the feedback from users and carers and a service review highlighted gaps in service provision for</p> <ul style="list-style-type: none">• supported living services for young people with multiple and complex physical and health needs including behaviour that challenges services• accessible quality accommodation for people with a learning disability and a physical disability <p>Both children’s and adult’s services stated intention is to provide facilities and accommodation that enable people with disabilities to stay in borough, keeping them close to their families and communities, and reducing the cost of out of borough placements. Though the strategy is now out of date, the position has not changed and there is a need to ensure building-based services are fit for purpose and meet the accommodation needs of this cohort in the future. This is echoed in the AfC SEND Futures Plan, and needs to be added to this section.</p>
Louise Fluker, The Richmond Society	Policy 12. Housing Needs of Different Groups - Paragraph 17.33	<p>We agree that helping older residents to remain in their own homes by making minor adjustments is a good objective but the Council should also focus on encouraging developers to build accommodation suitable for older or less mobile residents who might then downsize from their existing properties</p>
Tim Catchpole, Mortlake with East Sheen Society	Policy 12. Housing Needs of Different Groups	<p>No comment.</p>
James Stevens, Home Builders Federation (HBF)	Policy 12. Housing Needs of Different Groups - Older persons housing	<p>At paragraph 17.33 of the Local Plan the Council observes: <i>Population growth is projected to be concentrated in older age groups (those aged 65 and over), with this age group being projected to increase by 50% from 2021 to 2039 in the latest official projections.</i> Relying on the construction of the small number of new homes that Richmond is required to deliver each year to Part M4 (2) and (3) standards or hoping that adaptations will be made to the existing stock (para. 17.33), will not provide an adequate response to the challenge of catering for an ageing population. Nor will these changes happen rapidly enough, especially to the existing stock, over the next decade to meet the needs for older people established by the London Plan. More specialist homes for older people are needed to encourage down-sizing. We strongly recommend that the Council includes in its new Plan the benchmark figure for the supply of older persons housing that is in the London Plan. Table 4.3 of the London Plan establishes a requirement for Richmond to provide 155 units of older persons housing per year from 2017-2029. London Plan policy H13, Part A, 1) requires the boroughs to take account of these benchmark figures when planning for the needs of older people. It is not an absolute requirement that Richmond Council meets this figure each year, but it is a figure that the Council should endeavour to achieve. Compared to other London boroughs, the Council acknowledges Part B, 3) of the policy states that <i>Proposals for new specialist older persons’ housing will be assessed against London Plan Policy H13, where it meets identified local need as set out in the Council’s Local Housing Needs Assessment, housing and commissioning strategies, including how an affordable housing contribution has been maximised.</i> The Council needs to clarify what it is intending here. Paragraph 4.13.4 of the London Plan states that the requirements of Policy H13 does not encompass the provision of care home type accommodation. As it says: <i>This policy contains requirements for ‘specialist older person housing’. It does not apply to accommodation that has the following attributes, which is considered ‘care home accommodation’:</i> Paragraphs 4.13.5 and 4.13.6 provide additional clarifications. The Council, therefore, will need to take care not to include the supply of care home accommodation as contributing to the benchmark requirements of Table 4.3. HBF does not support the supplementation of the Council’s own assessment of need with the assessment undertaken by the GLA. As the Council recognises, London is a single housing market area, and the assessment of housing need, including the need for specialist accommodation of various types, is one that is undertaken by the GLA on behalf of all the London boroughs and the two development agencies.</p>
Gavin Hindley, St Mary’s University	Housing needs assessment	<p>We believe this document reflects the position regarding provision of student residential accommodation subject to two amendments: 3. Para 8.74 – since our discussions with Iceni, we have undertaken further work on our accommodation projections. The figure of “893” should be “950”. 4. Para 8.85 - with regard to the statement “There is therefore no requirement to increase the overall housing need on the basis of student growth....” The proviso should make it clear that the statement will not apply if our predicted growth in residential provision cannot be contained within our existing landholdings with the support of the Council.</p>

	Policy 13. Housing Mix and Standards	
Myrna Jelman	Policy 13. Housing Mix and Standards	Sustainability for new residents not just technical sustainability of new developments: I urge you to set minimum standards for new developments for our Borough that are higher than the minimum standards. Real people will need to live in these developments and minimum room size, minimum number of sunlight hours, minimum ceiling height (2.5m is inadequate), not being overly overlooked, etc. are extremely important for mental and physical health.
Tim Catchpole, Mortlake with East Sheen Society	Policy 13. Housing Mix and Standards	We note the additional statement that areas within PTAL 3-6 or within 800m of a station or town centre boundary should provide a higher proportion of small units and that for market housing the highest demand is for 2 and 3 beds. We also note the new mention of the minimum floor to ceiling height being 2.5m but could not find any reference to apartments needing to have more than one view.
Mamun Madaser, Habinteg Housing Association	Policy 13 - Housing Mix and Standards	<p>The draft local plan states "At least 10% of all new-build housing (via works to which Approved Document M (ADM) Volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (3) ‘wheelchair user dwellings’ and all other new-build housing (created via works to which Part M volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (2) ‘accessible and adaptable dwellings’, in accordance with London Plan Policy D7. Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement as set out in London Plan Policy D5 to demonstrate how the highest standards of accessible and inclusive design have been achieved."</p> <p>Habinteg strongly supports this policy and recommends that all new homes meet Building Regulations M4 Category 2 accessible and adaptable standard homes to meet the needs of disabled and older people in Richmond. Further, to address a deficit of wheelchair accessible homes, Habinteg recommends that 10% of new homes comply with Part M4 (3) Standard (wheelchair accessible).</p> <ul style="list-style-type: none">• 14.1 million people in the UK are disabled (Scope)• 45% of pension age adults are disabled• 1.2 million people use wheelchairs (NHS)• Over 400,000 people nationwide are living in homes that do not provide the accessibility they need. <p>LOCAL BENEFITS OF ADAPTABLE AND ACCESSIBLE HOMES</p> <p>New homes that meet category M4(2) will deliver:</p> <ul style="list-style-type: none">- significantly fewer disabled people out of work, further reducing the impact on local government spending*- faster hospital discharges- reduced local government expenditure on more expensive residential care settings- provide a better environment for ongoing independence when needs change, <p>*Research from Habinteg and Papworth Trust reported that disabled people with appropriate, accessible homes are four times more likely to be in work than those in unsuitable properties. Providing suitably accessible homes in a welcoming and inclusively designed neighbourhood can transform the lives of people who are so often left to ‘make do’ in unsuitable accommodation. Habinteg tenants have reported that having their need for accessible homes met can have wide-ranging positive impacts: - finding and maintaining employment - Improved family life such as the ability to access their children’s rooms or to cook a family meal - the ability to come and go as they wish to visit family and friends.</p> <p>LOCAL BENEFITS OF WHEELCHAIR-READY HOMES</p> <p>Habinteg recommends that alongside an increased supply of accessible and adaptable homes, an adequate number of homes should be built to Building Regulations M4 Category 3 (wheelchair user dwellings standard).</p> <p>There are 1.2 million wheelchair users in the UK, and Habinteg’s Insight Report found that just 1.5% of homes outside London are set to be built to wheelchair dwelling standards between 2020 and 2030 .</p> <p>Given the lack of wheelchair accessible properties available in general across the country, Habinteg believes that a 10% requirement of Part M4(3) homes should be considered as a starting point for all local plans, with the remaining 90% meeting Part M4(2) accessible and adaptable dwellings.</p> <p>A NATIONAL ACCESSIBLE HOMES DEFICIT WITH A LOCAL SOLUTION</p> <p>The English Housing survey reported that 91% of existing homes do not provide the four access features for even the lowest level of accessibility – a home that is ‘visitable’.</p> <p>Habinteg’s Insight Report: A Forecast for Accessible Homes 2020 found that just 31.5% of homes are required to meet an accessible housing standard between 2020 and 2030. This will compound the national accessible homes deficit.</p> <p>It is essential that new homes deliver accessibility and adaptability to help meet the national accessible homes deficit.</p> <p>Further information and references:</p> <ol style="list-style-type: none">1. Habinteg’s in house consultancy Centre for Accessible Environments (CAE) offers bespoke training and consultancy on all aspects of access, including housing, public spaces and community facilities. CAE’s services may benefit the Richmond planning department in ensuring housing is delivered to the required M4(2) / M4(3) standards. The team has delivered support to several local authorities and statutory bodies such as Homes England, helping upskill staff in the specific characteristics of accessible housing and providing practical support reviewing development plans and proposals. You can read more on the CAE website at www.CAE.org.uk2. Housing and Disabled People, a toolkit for local authorities, was a joint project of Habinteg and the Equality and Human Rights Commission published in 2018. The chapter on Planning for Accessible Homes provides some helpful suggestions for producing robust planning policies for accessible housing. https://www.habinteg.org.uk/ehrc3. Habinteg’s Insight Report: A Forecast for accessible homes assessed accessible housing policy across all local planning authorities in England. You can read the full report and headline findings here. https://www.habinteg.org.uk/localplans/ <p>ABOUT HABINTEG</p> <p>Habinteg has over 50 years of experience as a registered provider of accessible and inclusive housing. Our mission is to provide and promote accessible and adaptable homes so that disabled and non-disabled people can live together as neighbours. Our response, therefore, focuses on issues of access and inclusion that we believe are vital to the development of a plan to serve the needs of the whole population of Richmond.</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Housing standards	[See comment on housing design, and health and wellbeing]

<p>Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer</p>	<p>Policy 13 Housing Mix and Standards</p>	<p>Recommended Amendments</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>A. Development should generally provide a mix of sizes and types of accommodation. Areas within PTALs 3-6 or within 800m distance of a station or town centre boundary should provide a higher proportion of small units (studios and 1 beds). For market housing, there is highest demand for 2 and 3 beds. The affordable housing mix should be based on discussions with a Registered Provider(s) to reflect local needs, in accordance with Policy 11 Affordable Housing. The housing mix should be appropriate to the site-specifics of the location.</p> <p>B. All new housing development, including conversions, are required to comply with the Nationally Described Space Standard. As also set out in London Plan Policy D6 on private internal space, the minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling. New homes significantly above the minimum <u>NDSS</u> standard that do not make efficient use of land will be resisted.</p> <p>C. All new housing development, including conversions, should provide adequate <u>private amenity external</u> space. Purpose built, well designed and positioned balconies, <u>winter gardens</u> or terraces are encouraged where new residential units are on upper floors, if they comply with Policy 46 Amenity and Living Conditions. Regard should be had to the Council's Residential Development Standards SPD as appropriate.</p> <p>D. <u>Private</u> amenity space for all new dwellings, including conversions, should be:</p> <ol style="list-style-type: none"> 1. private, usable, functional and safe; 2. easily accessible from living areas <u>or bedrooms where appropriate;</u> 3. orientated to take account of need for sunlight and shading <u>where feasible;</u> 4. <u>in line with London Plan minimum standards for private amenity space of a sufficient size to meet the needs of the likely number of occupiers;</u> and 5. accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space. <p>E. At least 10% of all new build housing (via works to which Approved Document M (ADM) Volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings' and all other new build housing (created via works to which Part M volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings', in accordance with London Plan Policy D7. Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement as set out in London Plan Policy D5 to demonstrate how the highest standards of accessible and inclusive design have been achieved.</p> </div> <p>Explanation/Justification As currently drafted, there are some minor issues regarding the likely effectiveness of the policy, as set out below:</p> <ul style="list-style-type: none"> - Section B of the policy should clarify that the 'standard' referred to in the policy is the NDSS standard to avoid misunderstanding. - Section C should make clear that reference is being made to private amenity space and that winter gardens can be an appropriate form of amenity on constrained sites. Winter gardens are a common feature across a number of London schemes and can help overcome issues of noise and air pollution on constrained sites. - Section D should make clear that this is in reference to Private Amenity. It is sometimes appropriate and/or necessary to have the amenity space accessed from the main bedroom. This is common in some one-bedroom apartments and the policy should not restrict this. Point D.4 should make it clear that it is the London Plan minimum standards that should be achieved for private amenity space.
<p>Faye Wright, Forward Planning and Development on behalf of BMO Real Estate</p>	<p>Policy 13: Housing Mix and Standards, Paragraph 17.53</p>	<p>Paragraph 17.53 sets out where developments are not able to meet policy requirements for housing mix and standards and states that the applicant should identify why.</p> <p>Suggested amendments:- This paragraph should include reference to listed buildings which, if being converted to residential may not be able to meet the mix and standards due to the plan form of the building. There may be heritage benefits in not meeting mix and standards and this should be recognised in this paragraph.</p>
<p>Alice Roberts, CPRE London</p>	<p>General Comment (in relation to green space within developments)</p>	<p>Finally, we would like the Council to ensure any new housing developments or estate regeneration 'infill' schemes do not leave residents with inadequate provision of green and communal open space.</p>
	<p>Policy 14. Loss of Housing</p>	
<p>Tim Catchpole, Mortlake with East Sheen Society</p>	<p>Policy 14. Loss of Housing</p>	<p>We note that this policy now includes a reference to 'embodied carbon and the circular economy' which is sensible.</p>
	<p>Policy 15. Infill and Backland Development</p>	

Richard Carr, Transport for London (TfL)	Policy 15. Infill and Backland Development	In A2, we welcome encouraging the redevelopment of car park sites to provide housing, although it should be noted that in policy H1 of the London Plan there is no need to demonstrate that the parking is no longer needed. This is because parking is known to induce car travel so demand for it should not be described as arising from ‘need’. As such, reductions in parking can deliver mode shift and reduce the dominance of vehicles in an area. To ensure consistency, this requirement should be deleted.
Tim Catchpole, Mortlake with East Sheen Society	Policy 15. Infill and Backland Development	We note that this policy now includes back garden development which in Policy LP39 came under a separate heading (39B). Back garden development is a key issue in our area, in particular ‘summerhouses’ equipped with water and electricity supplies with potential for becoming offices, granny flats or even air B&B. The policy on back garden development needs strengthening and we would like to see this remain as a separate section and not be confused with backland.
Vicky Phillips, Habitats & Heritage	Policy 15. Infill and Backland Development	We agree that garden land needs protection as it often forms part of green corridors between larger green spaces or is home to species that are protected or considered endangered nationally and under the Richmond Biodiversity Action Plan, particularly bats, various bird species, hedgehogs, stag beetles etc. The recent debacle concerning land behind the Prince Albert pub at 24 Hampton Road Twickenham, where mature trees and shrubbery hosting bats and protected species of birds were removed prior to a planning application being lodged for the whole site, shows that the Council probably needs to lobby for additional powers.
James Stevens, Home Builders Federation (HBF)	Back Gardens	[See comment relating to development in back gardens]
	Policy 16. Small Sites	
Theresa Oddelm, The Royal Parks	Policy 16 Small Sites	We note that the London Plan sets out a strategic priority to increase the rate of housing delivery from small sites but not at the expense of open space. However, there is potential for such small sites to be located close to the Royal Parks which could have an impact either individually or cumulatively on the Parks. We would like to see this addressed specifically in the Small Sites policy.
Tim Catchpole, Mortlake with East Sheen Society	Policy 16. Small Sites	We have seen a number of planning applications recently in our area for the redevelopment of substandard lock-up garages and/or the development at the rear of corner sites with access from side roads. Some of these have been approved and some refused. We would like to see clearer policy guidance on this.
Nina Miles, GLA on behalf of Mayor of London	Policy 16. Small Sites	We welcome the commitment in Policy 16 to support the delivery of Richmond’s small sites target of 234 new homes per annum and the incremental intensification of well-connected residential areas (PTAL 3-6 or within 800m of a station) in accordance with the LP2021.
	Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic	
Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to culture)	We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council’s Culture Richmond 2021-2031 Plan.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to culture)	We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council’s Culture Richmond 2021-2031 Plan.
	Policy 17: Supporting our centres and promoting culture (Strategic Policy)	
Tim Catchpole, Mortlake with East Sheen Society	Policy 17: Supporting our centres and promoting culture (Strategic Policy)	We note that East Sheen is designated as a District Centre and that the boundaries of this centre are to remain unchanged. The E-W extent of the centre runs along the Upper Richmond Road West from Wallorton Gardens to Coval Road and the N-S extent along Sheen Lane from Milestone Green to Mortlake station. The key and secondary shopping frontages on the Upper Richmond Road West however are seen (from Appendix 1) to extend from East Sheen Avenue to Coval Road leaving a number of shop frontages and other non-residential frontages outside the secondary frontage limits. These physical limits need to be better-defined taking into account additional features such as footway widths, scope for hard and soft landscaping and opportunities for creating “Centre Gateway” treatments. This is needed given the admitted uncertainties related to the forecasted speed of change evidenced from phase 1 of the Retailing and Leisure Study. We also note the need to improve wayfinding and the provision of WCs.
Alice Shackleton, on behalf of The Kew Society	Policy 17 Supporting our centres and promoting culture	The policy supports "shopping, leisure and culture uses" in the centres identified. These would include Kew Gardens, Kew Road and Sandycombe Road in different categories of centre. It may be intended but is this wording, "shopping, leisure and culture" intended to represented Use Class E? The area at Kew Gardens Station is attracting more coffee shop/café uses now (as is the case in many centres including Richmond) and it might be useful to stress that a range or mix/diversification of uses is supported so that a preponderance of coffee shops/cafes is resisted where that might overwhelm the mix of uses supporting a community envisaged by Policy 1. Also, would this wording, "shopping, leisure and culture use" include uses such as beauty salons, spa-type uses, fitness studios such as Pilates studios? These uses have been increasing and in some locations, for example, on Sandycombe Road, Kew, where there were empty retail shops with reduced chance of becoming viable for retail use certainly in the current climate, were supported by The Kew Society and apparently have become successful businesses meeting a community need. We suggest, therefore, that such uses be encouraged, and, if not encompassed within the draft policy wording, that they be added to that wording. It may be that these uses would be more appropriate in the smaller centres rather than the five town centres but that could be made clear. We note and support the provisions in paragraphs 18.21 - 23.
Nina Miles, GLA on behalf of Mayor of London	Policy 17: Supporting our centres and promoting culture (Strategic Policy) - Town centres	Policy SD6 LP2021 seeks to promote the vitality and viability of London’s town centres. We note and support the approach to use the existing stock of vacant properties in Richmond’s centres to meet the need identified in the RLNS 2021. The approach towards diversifying and repurposing high streets and centres for a wider range of uses is supported and we note that this will help to facilitate Richmond’s strategic policy Living Locally and the 20-minute neighbourhood.
Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 17 Supporting Our Centres	Recommended Amendments Based upon the explanation and justification below, the following amendments are recommended to ensure the soundness of draft Policy 17: - Part A of the draft policy should be amended to include reference to major retail and leisure development also being directed towards allocations in the Local Plan (otherwise Policy 17 does not properly and accurately describe the retail and leisure development strategy in the Borough). - Amend paragraphs 6.181 to 6.185 to reflect the following: o The supporting text should be updated to reflect the preparation of a new retail study, which renders the current content paragraphs 6.181 – 6.184 out of date and inaccurate. o remove the theoretical assumption in 6.182 that all new town centre uses could be accommodated in vacant shop units. o whilst it may be the case, as stated in 6.183, that re-purposing existing retail floorspace has a genuine part to play in retail development strategy for the Borough, this does not mean that there is no requirement to allocate sites for major retail development (as allocations may be designed to redevelop existing floorspace to meet identified needs). Explanation/Justification

		<p>Draft Policy 17 provides a straight-forward and logical approach to the defined ‘town centres’ across the Borough. It emphasises support for locating a range of land uses within the defined ‘town centres’ , which is in line with national policy and thus should be supported.</p> <p>The decision to define the centre hierarchy after 6.174 is also supported, as it provides clarity to the Local Plan strategy. However, we would urge the Council to make amendments and additions to this section, in the interests of clarify, for two main reasons.</p> <p>First, the Local Plan should be clear over which locations in the table after 6.174 should be classified as ‘town centres’ for the purposes of applying development management policies such as the sequential and impact tests. The Glossary to the NPPF notes that:</p> <p><i>“References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance”.</i></p> <p>Therefore, in light of this clear national policy, the Council is required to determine and justify which centres are capable of meeting the definition of a ‘town centre’ and this will require an assessment of the scale, role, catchment and function. Without this clarity, the Local Plan is failing to meet national policy.</p> <p>Second, the Local Plan should define the role and function of the various tiers of centre in the formal ‘town centre’ hierarchy. This is required for clarity and to explain the role of ‘town centres’ in the Borough, including their key characteristics, role and function. It is also required to assist with the operation of the sequential and impact tests, particularly the choice of which centres should be considered as potential realistic alternative locations for main town centre land use proposals.</p> <p>On a separate matter, whilst it is reasonable for the main ‘town centres’ policy to refer to the contents of the evidence base, the content of paragraphs 6.181 to 6.184 will need to be re-visited and updated in the next draft of the Local Plan in light of the decision by the Council to undertake a further retail study for the Borough. Indeed, if Policy 17 intends to rely upon the evidence base to support the development strategy therein then the evidence base must tackle the issues / topics in question and provide a reasoned and robust analysis. At the present time, the retail floorspace forecasts quotes in this part of the supporting text are based upon evidence data which is either already out of date (due to the age of the household survey) or will soon become out of date due to the publication of new economic forecasts by Experian in late January 2022. Moreover, if the policy is based, in part, on using vacant floorspace to meet identified needs then the land use surveys should be updated given the on-going effects of the COVID-19 pandemic.</p>
Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Evidence Base – Retail and Leisure Needs Study (Part 1) (2021)	<p>The Phase 1 Retail Study, whilst published in 2021 and containing data gathered by the Council and its consultant recently, relies upon historic information, most notably a survey of shopping patterns dating from 2014. Therefore, whilst the Council has indicated that a further (Phase 2) study is to be published in early 2022, the current evidence base is out of date and cannot be relied upon to support the new Local Plan.</p> <p>Therefore, whilst the preparation of a new retail and town centres study (including a new household survey) is to be welcomed, it must be noted that the Phase 2 study has not yet been published. Given the importance of the new study in its supporting role to retail and town centre planning policies, including specific site allocations, to the soundness of the new Local Plan, interested parties must be given a fair opportunity to comment on the content of the new study and how its recommendations translate to the content of the new Plan.</p> <p>With regards to the content of the Phase 1 Study, and how this may be taken forward in the next stage of the study, we recommend that the following matters are addressed:</p> <ul style="list-style-type: none">- A restriction on the amount of convenience goods floorspace at Kew Retail Park (KRP) would not be supported by any recommendations in the Phase 1 retail study. A restrictive approach at KRP would require a clear and reasonable justification which is not provided in either the Phase 1 retail study and / or the draft Plan itself. In particular, it is briefly suggested that a restrictive approach would protect the health of town centres but no evidence is provided in order to demonstrate that the provision of replacement / net additional convenience goods floorspace at Kew Retail Park will lead to any harm to nearby defined ‘town centres’.- The methodology for assessing quantitative retail floorspace capacity. The Phase 1 Study does not appear, as is best practice, to assess current/future quantitative retail needs with reference to the existing performance of stores/centres (i.e. actual turnover v benchmark/average turnover). It ignores current actual trading performance and the specific issues associated with retail provision across the Borough.- Consideration of qualitative needs. It is best practice to consider qualitative indicators of need alongside quantitative indicators. This does not appear to be included in the Phase 1 Study. This is considered particularly important in relation to the distribution of retail floorspace in the Borough and the Council’s strategy of providing local facilities for the resident population.
Alice Shackleton, on behalf of The Kew Society	Paragraph 18.12	<p>Paragraph 18.12 states that the public realm needs, amongst other items, public toilets to encourage people to dwell, with walkable environments. We note and support that such provision is supported by the Council in general and, in particular, form a part of the public realm requirements for new major developments (paragraph 25.5).</p> <p>We refer to our comments under Policy 17 above.</p>
Louise Fluker, The Richmond Society	Paragraph 18.13 New Permitted Development Rights:p197	<p>we agree with the Council’s Article 4 Direction requiring planning permission for change of use from Class E to residential use</p>
	Policy 18. Development in centres	
Tim Catchpole, Mortlake with East Sheen Society	Policy 18. Development in centres	<p>We note the intention to create “shop-like” appearances to empty retail premises but frankly consider this to be papering over the problem when far more pro-active initiatives to do with ownership, pricing and Use Class management are warranted. We note the challenges and opportunities involved with Use Class E.</p>
Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	Policy 18. Development in Centres	<p>Draft Policy 18 (Part C) as drafted does not acknowledge the trip generation of visitor attractions such as Twickenham Stadium. It currently states (p.198):</p> <p><i>"C. Major development and/or developments which general high levels of trips should be located within a town centre boundary. Elsewhere development in the Areas of Mixed Use should accommodate development serving a more localised provision, which may include opportunities for retail, recreation, and smaller-scale employment uses..."</i></p> <p>We propose the policy is reworded as follows to take account of Twickenham Stadium and the Borough's other visitor attractions:</p> <p><i>"C. Major development and/or developments which generate high levels of trips should be located within a town centre boundary (with the exclusion of visitor attractions including Twickenham Stadium). Elsewhere development in the Areas of Mixed Use should accommodate development serving a more localised provision, which may include opportunities for retail, recreation, and smaller-scale employment uses..."</i></p>
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 18. Development in centres	<p>We refer to Arup's Urban Design Study, December 2016; Lichfields Richmond-upon-Thames Retail and Leisure Needs Study Phase 1 Update, July 2021; Icení's Richmond Local Housing Market Assessment, December 2021; and Santec's Employment Land and Premises Needs Assessment, December 2021- all provided as supplementary evidence by the Council.</p> <p>We have sought to pull together the estimated demand and availability of floor space for all uses in Richmond Town from 2021 to 2039.</p> <p>Richmond Zone 1 Retail, Non-retail services and Leisure Floor space</p> <p>Lichfields' Report estimates population as shown in Figure 1 and retail, non-retail services and leisure over/under supply in Figure 2. Richmond borough is divided by Lichfields into 7 zones: Richmond, Twickenham, Whitton, Teddington, Hampton, Kew/North Richmond, Barnes/E Sheen. The focus here is on Zone 1 for which a map is shown in Figure 3. The population for the borough is estimated to rise by only 2.9% from 2021 to 2039 and to decline slightly in Richmond Zone 1. The over/under supply of space is calculated by estimating the expenditure per person and then the total available expenditure based on the population. Expenditure from existing facilities is estimated and subtracted from the available expenditure to establish the incremental expenditure from new facilities. This increment is then converted into net floor space by turnover density factors and finally into gross floor space over/under supply. We question why Table 11 page 74 of the Lichfields' Report is headed Gross floor space - a step of first calculating Net floor space seems to be missing.</p> <p>It is estimated that in 2039 there will be an under supply of retail and non-retail services floor pace of 1,457 m2 and an over supply in preceding years. There is an estimated under supply of 7,000 m2 for leisure in 2039 and 4,000 m2 in 2034 but no information for earlier years. Non-retail services include hairdressers, banks, restaurants, cafes and hot food takeaways. Leisure includes cinemas and cultural activities. Home/internet turnover is taken into account.</p>

Table 1	Population				
	2021	2024	2029	2034	2039
Population Richmond Zone 1 see map attached	23,031	22,440	22,056	22,170	22,536
Population Richmond Borough	199,603	198,220	200,146	201,548	205,200

Figure 1 Source Lichfields report on Retail and Leisure

	Table 3.1a	Over(-)/under(+) Supply Cumulative Gross Floorspace				
	Total 2017	2021	2024	2029	2034	2039
	m2	m2	m2	m2	m2	m2
Retail Convenience	7,950		-246	-163	55	388
Retail Comparison	31,727		-1,594	-2,075	-1,895	-1,342
Food/beverage	4,640		-3,266	-217	891	2,411
Non-retail Services						
Total	44,317		-5,106	-2,455	-949	1,457
Leisure					4,000	7,000

Figure 2. Source Lichfields report on Retail and Leisure

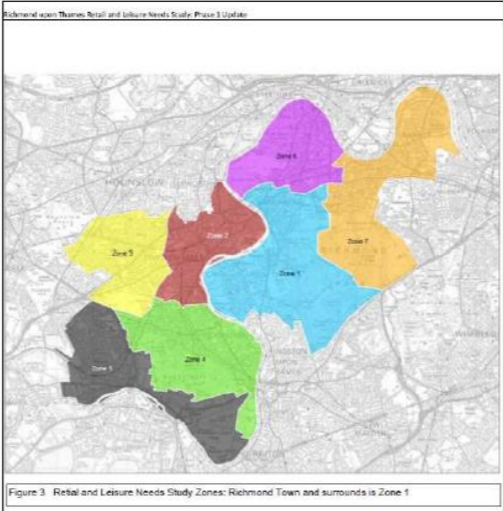


Figure 3 Retail and Leisure Needs Study Zones: Richmond Town and surrounds is Zone 1

Office Floor Space

It is claimed by Santec's report that there is an under supply of office space in Richmond borough and that significant space has been lost to residential use through permitted development rights. The report examines four areas of which Richmond Town is one. The Report says 'Occupiers are attracted to Richmond due to the range of quality and size of space as well as access to amenities and rail links to south and central London' The Report estimates the 2021 demand rising from 46,366 m2 in 2021 to 92,304 m2 in 2039 across Richmond borough using Experian estimates. Using GLA employment estimates to derive office floor space produces a higher demand of 200,000 m2 in 2039. Current stock is around 230,000 m2. Unfortunately the Santec report does not provide separate figures for Richmond Town but we might assume that since Richmond Town is the largest supplier of office space the estimated under supply also applies in part to Richmond Town. However, there is existing vacant space in Richmond Town which includes the conversion of the Richmond Magistrates Court (a gain of 4,400 sq m) and Sovereign Gate, Kew Rd (recorded as a 2,600 m2 and potentially House of Fraser at 5,777 m2. There are also a number of smaller vacant units.

Housing

Unfortunately, Icen's report on Housing discusses units but not floor space and it tends to deal with the borough as a whole. We know that the London Plan requires 411 units to be built across the borough each year to 2029. But we saw earlier that the population in Richmond Town is set to decline slightly up to 2039. At a very rough guess of gross 65 m2 per unit for accommodation the requirement for additional housing would be for around 27,000 m2 per year across the borough.

Supply of Floor space.

We are concerned that the character of Richmond Town, which is so important in attracting appropriate uses to the town and preserving the town's success for all stakeholders, will be harmed by an imbalance amount and type in the development of floor space.

We welcome the recognition in the Local Plan of the implications, including the risks, of the new combined business land Use Class E and changes to permitted development rights. There is potential for change in Richmond Town's Key and Secondary Frontage and levels above ground floor and that this may provide beneficial flexibility but it introduces considerable risks of change to the town, which as the Urban Design Study 2021 says is of high sensitivity to change and extensive change is not appropriate. The Council's control is limited to conditions and planning obligations and Article 4 Directions. We note that Key and Secondary Frontage in Richmond Town is unchanged between the Local Plan 2018 and the new draft Local Plan.

Conclusion

We recommend that the several reports on floor space be updated and co-ordinated and besides assessing the borough estimates that they also provide comprehensive estimates across all future uses for Richmond Town. Also, there needs to be a reliable pre-covid Base year stock take for all uses in Richmond Town - say 2019. At the moment the evidence is piecemeal or missing, notwithstanding our attempts at pulling the data together in this response. Furthermore, we believe it would be unwise to place too much weight on the quantitative estimates of the future. Instead there should be recognition of the uncertainties and risks by applying sensitivity analysis and focussing on planning controls the Council can deploy. We do not believe the estimates are sufficiently robust to support major development at Richmond Station or higher buildings.

Recommended Amendments and Explanation

Part B – Defining Frontages and Boundaries

At the present time, the draft Local Plan refers to **key and secondary frontages** in part B of draft Policy 18 and provides a detailed description of these areas in Appendix 1 of the document. It is, however, important that the defined boundaries conform to the requirements of national planning policy and guidance.

Nick Alston, Avison Young
on behalf of St George Plc
and Marks & Spencer

Policy 18 Development in Centres

		<p>Whilst all local authorities are now required to deal with the recent changes to the use classes order and permitted development rights, NPPF paragraph 86(b) continues to require planning policies to define the extent of town centres and primary shopping areas. Not only is it required for the new Richmond Local Plan to ensure conformity with national planning policy but it will also assist in the operation of the sequential test for future main town centre land use proposals¹. This should be clarified in the new version of the Local Plan.</p> <p>In addition, it is to be noted that the latest version of the NPPF removes the formal requirement to define primary and secondary frontages. This is, no doubt, a reflection of the changing nature of town centres and an acknowledgement by central government that retail uses² are no longer the central pillar to the health of centres. It also conforms with the introduction of Use Class E. The PPG does still refer to primary and secondary frontages:</p> <p><i>“Authorities may, where appropriate, also wish to define primary and secondary retail frontages where their use can be justified in supporting the vitality and viability of particular centres”.</i></p> <p>However, if it is clear that a clear justification should be provided. Therefore, we would expect the new Local Plan to provide town centre and primary shopping area boundaries and only defined frontages where they can be justified in their own right (in the face of the parameters of Use Class E) and be accompanied by sound development management policies which are required and effective.</p> <p><u>Part C – High Trip Generating Development</u></p> <p>Part C of the policy requires major development that generates high levels of trips to be located within a town centre boundary. This is not consistent with other parts of the plan (notably the site allocation for Kew Retail Park) and therefore is not in accordance with national policy (NPPF para 16(d)). This can be resolved by amending the text to ‘.....should be located within a town centre boundary or as per site specific allocations’.</p> <p><u>Part F – Out-of-Centre Retail Development</u></p> <p>Part F of the policy states that ‘out of centre development is not considered appropriate in line with the London Plan’. This is not in general conformity with the London Plan (and therefore not in accordance with national policy). The London Plan does not state that out-of-centre development is inappropriate. In line with national planning policy, London Plan Policy SD7 (Part A) requires boroughs to take a town centres first approach. While in most instances this ‘discourages’ out-of-centre development, it does not preclude it.</p> <p>The principal exception supported by London Plan Policy SD7 Part A(3) (as also firmly encouraged by London Plan Policy E9 (Part C(6)) and Policy H1) is the requirement for boroughs to realise the full potential of existing out-of-centre retail parks to deliver housing intensification through development, where this does not result in a <u>net increase</u> in retail floorspace unless this is in accordance with the development plan or can be justified through the sequential test and impact assessment policy requirements. In practice this supports the principle of <u>replacement</u> out-of-centre retail development.</p> <p>In order for the policy to be sound, we recommend that the policy wording is amended to state that ‘out of centre development is not considered appropriate except where this involves the replacement of existing out-of-centre development and/or is in accordance with site allocations’.</p> <p><u>Part F – Sequential Test and Impact Assessment Requirements</u></p> <p>Amendments are required in relation to the approach to main town centre land use proposals in Part F. This part of draft Policy 18 is the only part of the draft Local Plan which refers to the sequential test for main town centre uses and impact assessments for retail and leisure. It is currently unsound and ineffective and requires the following amendments:</p> <p>With regards to the sequential test, it is entitled to refer to national policy and guidance in relation to the specifics of any assessment although the following should be incorporated into the policy and supporting text:</p> <ul style="list-style-type: none">- The policy should make it clear that, in principle, it relates to proposed main town centres in certain circumstances.- The policy is not, however, in conformity with national policy as the sequential test applies to proposals for main town centre uses located outside of defined centres and not in accordance with an up to date development plan. This latter point needs to be included in Policy 18 in order that it reflects national policy in general and also the decision to allocate sites for retail development such as Kew Retail Park. The allocation of Kew Retail Park is a result of a number of factors, but in relation to retail land use provision it is acknowledged to be an established retail destination whose redevelopment can make a positive contribution to the development strategy for Richmond. Therefore, the sequential test should not apply to proposals at Kew Retail Park (or any other retail allocation) in the same way as other unallocated out of centre retail / main town centre land use proposals. This should be reflected in both Policy 18 and the site allocation policy. Similar inconsistencies occur in the draft Local Plan in relation to the impact test. In particular, the policy requires amendment in order to reflect the provisions of the NPPF and London Plan Policy SD7 which do not require an impact assessment for proposals in accordance with a development plan. It is, of course, acknowledged that some development plan policies / allocations may not be specific about the exact scale and nature of floorspace and there a proportionate impact assessment may be appropriate (tailored to the circumstances of each site / allocation). <p>¹ The Council will no doubt be aware of the sequence of preferred locations for main town centre land uses, including: in-centre; edge-of-centre; and out-of-centre. The Glossary in the NPPF notes that: <i>“For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances”.</i></p> <p>² former Class A1</p>	
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment in relation to planning uses	We welcome the recognition of the implications, including the risks, of the new combined business land Use Class E and changes to permitted development rights. We comment later on this topic and the potential consequences for balancing the uses of Richmond Town and its character.	
	Policy 19. Managing impacts		
Alice Shackleton, on behalf of The Kew Society	Policy 19. Managing Impacts	We note and support Policy 19. We note that the effect of Use Class E does limit the Council's powers.	In D "Overconcentration of Uses" perhaps the words "restaurants and cafes with outdoor seating areas" could be added after "(betting shops, public houses, bars and take-aways)". There are such establishments in the Kew Gardens Station area. The potential to reduce diversification of uses applies to these uses as well as the potential adversely to affect the amenity of residents, thus comprising the notion of community in the 20 minute neighbourhood concept.
Louise Fluker, The Richmond Society	Policy 19 Managing Impacts	we support the draft policy. Whilst there needs to be flexibility in change of use to reflect changes in society (e.g. the shift from retail to leisure activities such as cafes, bars etc which appeal to visitors to Richmond, there must be a balance that takes account of the residents’ enjoyment of their properties.	
Tim Catchpole, Mortlake with East Sheen Society	Policy 19. Managing impacts	We note that HMG is considering the case for making external areas brought into temporary use during the pandemic available permanently. If this transpires then there is the need to designate suitable frontages that are capable of mitigating adverse impacts.	
Nina Miles, GLA on behalf of Mayor of London	Policy 19. Managing impacts - Agent of Change	Policy D13 LP2021 details the Agent of Change principles and we note that Policy 19 aligns with this approach, placing the responsibility of mitigating the impact of late night uses onto the proposed residential use. A reference to Policy D13 would be welcomed here.	
Peter Willan, Paul Velluet and Laurence Bain on	General comment in relation to Evening and Night Time Economy.	We note support throughout the Local Plan to Richmond town centre Night Time economy and in some cases extending to the Riverside and Richmond Green. We welcome the caveat in the Local Plan as stated in Policy 19, Managing Impacts and elsewhere, that there is a combined and cumulative impact that needs to be controlled and that amenity of residents needs to be	

behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)		<p>protected. It may be semantics but we recommend a greater distinction between the evening and night time economies with the later applying to the late evening early hours of the morning. We are opposed to supporting a Night time economy in Richmond Town and on and around Richmond Green due to resident harm and the Riverside due to resident harm including those on the Twickenham riverside.</p> <p>Richmond town and surrounding areas have one of the highest ratios of pubs and bars to residents in the whole of London and moreover confined to a small area by the Thames and railway line. Public transport is reduced by midnight and is very limited shortly thereafter. Police and cleansing resources are not available at night time. We support the evening economy, and increasing family use, but the town needs to wind down before midnight so residents can get their eight hours sleep as advised by the WHO, difficult as this is with Heathrow night flights starting at 4:30am. We note Policy 19 does enable the Council to limit closing hours of premises. But we urge the Local Plan to go further. Night time economy infers activity past 11pm into the early hours of the morning and we would urge the Local Plan to explicitly discourage this in Richmond Town, but of course recognising there may be exceptions. Disturbance of residents arises to those living in the heart of the town as well as on and around Richmond Green and along the Riverside which also includes resident disturbance on the Twickenham riverside. We urge better distinction between the evening and night economies.</p>
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 19. Managing impacts	We support Clause D of the policy which seeks to avoid an over-concentration of uses which can have a determinantal impact on health and wellbeing. The policy refers to betting shops, public houses, bars and take-aways, but this could be extended to pawnbrokers, pay-day loan stores and amusement centres in line with paragraph 6.9.5 of the London Plan. We suggest public houses are removed from his policy as an overconcentration is unlikely to occur and the policy emphasis under Policy 20 is to resist their loss recognising their architectural and community value.
Ben Fox, Planware LTD on behalf of McDonald’s Restaurants LTD	Policy 19. Managing impacts & Policy 51. Health and Wellbeing (Strategic Policy)	<p>1 Introduction</p> <p>We have considered proposed Policies 19 and 51– with regard to the principles set out within the Framework. We fully support the policy’s aim of promoting healthier living and tackling obesity. However, the proposed policy approach is unsound and fails to provide an evidence-based way of achieving the policy’s objective. It has also been found unsound by several planning inspectors. It is too restrictive and prevents local planning authorities from pursuing more positive policy approaches. The London Borough of Waltham Forest has had such a policy in place for over a decade and its application has proven ineffective in tackling obesity to date.</p> <p>Within these broad points we have the following policy objections to draft Policies 19 & 51:</p> <p>A. The 400m exclusion zone is inconsistent with national planning policy</p> <p>B. The policy is inconsistent, discriminatory and disproportionate.</p> <p>C. Examination of other plans have found similar policy approaches to be unsound.</p> <p>D. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework.</p> <p>In summary, Planware Ltd consider there is no sound justification for a policy such as policies 19 and 51 which impose a blanket ban on restaurants that include an element of hot food takeaway “<i>within 400-metres of a school.</i>” This is unsound it should be deleted from the plan.</p> <p>However, as stated in the opening paragraph, Planware Ltd supports the aim of promoting healthier living and tackling the obesity crisis. We acknowledge that planning can have a role in furthering these objectives. We would therefore welcome and support any studies between obesity and their relationship with development proposals, including examination of how new development can best support healthier lifestyles and tackling the obesity crisis. When a cogent evidence base has been assembled, this can then inform an any appropriate policy response. This has still not emerged.</p> <p>Given the lack of any clear agreement between experts on the indices of obesity or poor health, analysing the evidence is a necessary part of this objection by way of background. This will all be highlighted in the below text.</p> <p>2 Contribution of McDonald’s UK to the United Kingdom</p> <p>This section of the objection sets out some background context relating to McDonald’s own business, its contribution to United Kingdom, and information on the nutritional value and healthy options of the food that it offers in its restaurants. This evidence is relevant to understanding the adverse and unjustified impacts of the blanket ban approach proposed under draft policies 19 & 51.</p> <p><i>Economic and Environmental Benefits</i></p> <p>The first store in the United Kingdom was first opened in 1974 in Woolwich, London. The store is still opened and was interestingly the 3,000th store across the world.</p> <p>With over 36,000 McDonald’s worldwide, it operates in over 100 countries and territories. Approximately 120,000 people are employed by McDonald’s UK, compared to just over 1 million employees worldwide.</p> <p>McDonald’s and its franchisees have become important members of communities in the United Kingdom: investing in skills and developing our people, supporting local causes and getting kids into football.</p> <p>Nationally, the company operates from over 1,300 restaurants in the UK. Over 80% of restaurants are operated as local businesses by franchisees, that’s around 1,100 franchised restaurants. McDonald’s is one of few global businesses that continues to anchor itself in high streets and town centres across the United Kingdom. Not just serving the general public but creating jobs and seeking to improve the communities around them.</p> <p>All McDonald’s restaurants conduct litter picks covering an area of at least 100 metres around the site, at least three times a day, picking up all litter, not just McDonald’s packaging.</p> <p>McDonald’s is a founding member of the anti-littering campaign, Love Where You Live. As part of this, our restaurants regularly organise local community litter picks. The campaign has grown and in 2017, 430 events took place across the UK with around 10,000 volunteers involved. Since the campaign started, 2,600 events have taken place with around 80,000 volunteers involved.</p> <p>McDonald’s restaurants are operated sustainably. For example, their non-franchised restaurants use 100% renewable energy, combining wind and solar and use 100% LED lighting which means we use 50% less energy than fluorescent lighting. All of their used cooking oil is converted into biodiesel for use by delivery lorries. Their entire fleet of lorries runs on biodiesel, 40% of which comes from McDonald’s cooking oil. This creates over 7,500 tonnes fewer CO2 emissions than ultra-low sulphur diesel.</p> <p>All new McDonald’s restaurants in the United Kingdom are fully accessible and we are working toward delivering this same standard for all existing restaurants.</p> <p>McDonald’s restaurants provide a safe, warm and brightly lit space for people, especially those who may feel vulnerable or threatened waiting for a taxi or outside.</p> <p>Many of their toilets are open to all members of the public. They are one of few night time premises that offer this service and given the fact restaurants are located in some of the busiest parts of the country, McDonald’s are helping to keep the United Kingdom cleaner.</p> <p><i>Nutritional Value of Food and Healthy Options</i></p> <p>McDonald’s offers a wide range of different food at its restaurants.</p> <p>Nutritional information is easy to access and made available online, and at the point of sale on advertising boards, as well as in tray inserts. Information is given on calorie content and key nutritional aspects such as salt, fat and sugar content. This enables an individual is able to identify and purchase food items and combinations that fit in with their individualised calorie or nutritional requirements.</p> <p>The menu offer includes a range of lower calorie options, some of which are set out in the on the next page. [see below]</p>

The restaurants now suggest meal bundles to assist customers in making informed, healthier choices. McDonald’s have suggested “favourites” meal bundles, across the breakfast and main menu that enable the choice of low-calorie options to be made even more easily. These 3-piece meal combinations will all be under 400kcal on the breakfast menu, and all under 600kcal on the main menu (with many options under 400kcal on the main menu also), and all individual items on these menu bundles will be either green (low) or amber (medium) on the Food Standards Agency traffic light system for food labelling.

Examples of low calorie (less than 400kcal) breakfast options (where no single item is red for FSA) include any combination of the following:

- Egg & Cheese McMuffin / Egg & cheese snack wrap / bagel with Philadelphia / porridge; with fruit bag; and a medium black coffee, or espresso or regular tea or water.

Examples of low calorie (less than 600kcal) main menu options (where no single item is red for FSA) are included in the table below. Some 90% of our standard menu is under 500 calories.

Main	Side Options	Drinks Options	Total Calories *varies depending on side & drink choice
The Garlic Mayo Chicken One – grilled wrap	Fruit Bag – Pineapple Stick	Diet Drink	Between 379-390kcal
	Carrot Sticks	Water	
	Side Salad with Fajita Dressing	Medium Black Coffee	
		Regular Tea	
The Sweet Chilli Chicken One – grilled wrap	Fruit Bag – Pineapple Stick	Diet Drink	Between 374-383kcal
	Carrot Sticks	Water	
	Side Salad with Fajita Dressing	Regular Tea	
		Medium Black Coffee	
Grilled Chicken & Bacon Salad with Fajita Dressing	Fruit Bag – Pineapple Stick	Diet Drink	Between 238-247kcal
	Carrot Sticks	Water	
		Regular Tea	
		Medium Black Coffee	

Those specifically wanting a meal low in either fat, salt, or sugar, can tailor their choices accordingly. Any combination of menu items sold at McDonald’s can be eaten as part of a calorie controlled nutritionally balanced diet. Customers alternatively eat anything from the menu allowing for this within their overall daily, or weekly nutritional requirements.

Quality of Ingredients and Cooking Methods

McDonald’s are always transparent about both their ingredients and their processes and strive to achieve quality. Their chicken nuggets are made from 100% chicken breast meat, burgers are made from whole cuts of British and Irish beef. Coffee is fair trade and their milk is organic. McDonald’s want their customers to be assured about what they are consuming. The ‘Good to Know’ section on our website - <https://www.mcdonalds.com/gb/en-gb/good-to-know/about-our-food.html> - provides a range of information about their processes and where produce is sourced from.

Menu Improvement and Reformulation

McDonald’s is actively and continuously engaged in menu reformulation to give customers a range of healthier options. Louise Hickmott, Head of Nutrition, at McDonald’s UK, has provided a letter giving examples of the steps that have been taken in recent years. The information is summarised below.

In recent years McDonald’s has made great efforts to reduce fat, salt and sugar content across their menu.

- 89% of their core food and drink menu now contains less than 500 kcal.
- Supersize options were removed from their menu in 2004;
- 72% of the Happy Meal menus are classified as not high in fat, salt or sugar according to the Government’s nutrient profile model;
- Since October 2015, 50% of the options on the drinks fountain have been no added sugar (Diet Coke, Coke Zero and Sprite Z);
- Recent years have seen the introduction of new items, offering more choice that has included porridge, salads, grilled chicken wraps, carrot sticks, fruit bags including apple and grape, pineapple sticks, and melon chunks, as well as orange juice, mineral water and organic semi-skimmed milk;
- Customers can swap fries for fruit bags, carrot sticks or shake salad on the main menu, or the hashbrown for a fruit bag or carrot sticks on the breakfast menu, at no additional cost;
- In 2014, McDonald’s introduced “Free Fruit Fridays” resulting in 3.7 million portions of fruit being handed out. Since then, discounted fruit is now available with every Happy Meal.

Fat

A recent meta-analysis and systematic review of 72 studies (45 cohort studies and 27 controlled trials) demonstrated that with the exception of Trans Fatty Acids (TFA), which are associated with increased coronary disease risk, there was no evidence to suggest that saturated fat increases the risk of coronary disease, or that polyunsaturated fats have a cardio-protective effect, which is in contrast to current dietary recommendations (Chowdrey et al, 2014).

However, UK guidelines currently remain unchanged; men should consume no more than 30g of saturated fat per day, and women no more than 20g per day (NHS Choices, 2013). It should be remembered that all fats are calorie dense (9kcal/g) and that eating too much of it will increase the likelihood of weight gain and therefore obesity, indirectly increasing the risk of coronary heart disease, among other co-morbidities.

What have McDonald’s done?

		<ul style="list-style-type: none">• Reduced the saturated fat content of the cooking oil by 83%;• Signed up to the Trans Fats pledge as part of the Government’s “Responsibility Deal”;• The cooking oil has been formulated to form a blend of rapeseed and sunflower oils to reduce levels of TFA to the lowest level possible;• They have completely removed hydrogenated fats from the vegetable oils;• Reduced the total fat in the milkshakes by 32% per serving since 2010;• Organic semi-skimmed milk is used in tea/coffee beverages and in Happy Meal milk bottles, with lower saturated fat levels compared with full fat variants. <p>Sugar</p> <p>Dietary carbohydrates include sugars, starches and fibre, and each has approximately 4kcal/g.</p> <p>The Scientific Advisory Commission on Nutrition (SACN) currently recommends that approximately 50% of total dietary energy intake should be from carbohydrates (SACN Report, 2015). In 2015 SACN recommended that the dietary reference value for fibre intake in adults be increased to 30g/day (proportionally lower in children) and that the average intake of “free sugars” (what used to be referred to as non-milk extrinsic sugars) should not exceed 5% of total dietary energy, which was in keeping with the World Health Organisation (WHO) recommendations.</p> <p>Current average intake of free sugars far exceeds current recommendations, and excess intake is associated with dental issues and excess calorie intake which can lead to weight gain and obesity.</p> <p>Over the last 10 years our reformulation work has resulted in 787 tonnes less sugar across our menu in 2017 versus 2007. What have McDonald’s done?</p> <ul style="list-style-type: none">• Reducing the sugar in our promotional buns, this removed 0.6 tonnes of sugar• Their Sweet Chilli Sauce has been reformulated to reduce sugar by 14% this equates to 155 tonnes of sugar removed• Their Festive Dip has removed 4 tonnes of sugar• Their famous McChicken Sandwich Sauce has reduced in sugar 45%• Their Tomato Ketchup has reduced in sugar by 20% which equates to 544 tonnes of sugar removed from the system• Their Chucky Salsa has reduced in sugar by 28%• Since 2016 they have reduced the sugar content of Fanta by 54%• The Toffee Syrup in their Toffee Latte has been reformulated to remove 20% of the sugar• McDonald’s have also reformulated their Frozen Strawberry Lemonade this has led to 8% sugar reduction per drink <p>Salt</p> <p>A number of health-related conditions are caused by, or exacerbated by, a high salt diet. The strongest evidence links high salt intake to hypertension, stroke and heart disease, although it is also linked with kidney disease, obesity and stomach cancer (Action on Salt website).</p> <p>Salt is often added to food for either taste or as a preservative, and in small quantities it can be useful. Adults in the UK are advised not to exceed 6g of salt per day, but the average intake at a population level is consistently higher than this.</p> <p>Salt does not directly lead to obesity; however, it does lead to increased thirst, and not everyone drinks water or calorie-free “diet” beverages. If our thirst increases and leads to increased consumption of calories from extra fluid intake, then this may lead to increased weight and obesity. 31% of fluid drunk by 4-18-year-old children is sugary soft drinks (He FJ et al, 2008), which has been shown to be related to childhood obesity (Ludwig DS et al, 2001).</p> <p>What have McDonald’s done?</p> <ul style="list-style-type: none">• The salt content across the UK menu has been reduced by nearly 35% since 2005;• Customers can ask for their fries to be unsalted;• The salt added to a medium portion of fries has been reduced by 17% since 2003;• The average Happy Meal now contains 19% less salt than in 2006• Chicken McNuggets contain 52% less salt than in 2003. <p>The process continues. McDonald’s have recently made the following changes to further improve their menu</p> <ul style="list-style-type: none">• Making water the default drink in the Happy Meals;• Making it easier for people to understand the existence of a wide range of under 400 and 600 calorie meal options that are available. <p>Third Party Opinions of McDonald’s</p> <p>McDonald’s regularly receive supportive comments from independent third parties.</p> <p>Professor Chris Elliott, of the Department for Environment, Food & Rural Affairs’ independent Elliott Review into the integrity and assurance of food supply networks: interim report, December 2013:</p> <p><i>“Each supply chain is unique, showing that there is no single approach to assuring supply chain integrity. The review has seen many examples of good industry practice that give cause for optimism. There is not space within this final report to reference all the good industry practices but those that have stood out include McDonald’s and Morrisons.”</i></p> <p>Jamie Oliver, the TV chef, food writer and campaigner speaking in January 2016 at the Andre Simon Food & Drink Book Awards to the Press Association:</p> <p><i>“Everyone always liked to poke at McDonald’s. McDonald’s has been doing more than most mid and small-sized businesses for the last 10 years. Fact. But no one wants to talk about it. And I don’t work for them. I’m just saying they’ve been doing it - 100% organic milk, free range eggs, looking at their British and Irish beef.”</i></p> <p>Raymond Blanc, the TV chef and food writer, speaking in 2014, after having presented McDonald’s UK with the Sustainable Restaurant Association’s Sustainability Hero award:</p> <p><i>“I was amazed. All their eggs are free-range; all their pork is free-range; all their beef is free-range.</i></p> <p><i>“[They show that] the fast-food business could change for the better. They’re supporting thousands of British farms and saving energy and waste by doing so.</i></p> <p><i>“I was as excited as if you had told me there were 20 new three-star Michelin restaurants in London or Manchester.”</i></p> <p>Marco Pierre White, TV chef and food writer, speaking in 2007:</p> <p><i>“McDonald’s offers better food than most restaurants and the general criticism of the company is very unfair.</i></p> <p><i>"Their eggs are free range and the beef is from Ireland, but you never hear about that. You have to look at whether restaurants offer value for money, and they offer excellent value.”</i></p> <p>These comments below represent independent opinions</p> <p>Supporting Active and Healthy Lifestyles among Employees and Local Communities</p> <p>McDonald’s is focused on its people and is proud to have been recognised for being a great employer. For example:</p> <p>Great Place to Work 2017 ‘Best Workplaces’ – McDonald’s are ranked 4th on the Great Place to Work 2017 ‘Best Workplaces’ list (large organisation). This is our 11th year on the list.</p> <ul style="list-style-type: none">• The Sunday Times Best Company to Work for List 2017 - we have made The Sunday Times 30 Best Big Companies to Work for list for the seventh consecutive year, achieving 6th position.• Workingmums.co.uk Employer Awards 2017- Innovation in Flexible Working - in November 2017, we were awarded the Top Employer for Innovation in Flexible Working by workingmums.co.uk. The judges specifically recognised our approach to Guaranteed Hours contracts.• The Times Top 100 Graduate Employers - the Times Top 100 Graduate Employers is the definitive annual guide to Britain’s most sought after employers of graduates.
--	--	---

		<ul style="list-style-type: none">• Investors in People Gold - Investors in People accreditation means we join a community of over 15,000 organisations across 75 countries worldwide and it is recognised as the sign of a great employer.• School leavers Top 100 Employees - McDonald's UK has been certified as one of Britain's most popular employers for school leavers in 2017, for the third consecutive year. An award voted for by 15-18 year olds in the UK. <p>In April 2017, McDonald's began to offer employees the choice between flexible or fixed contracts with minimum guaranteed hours. This followed trials in 23 restaurants across the country in a combination of company owned and franchised restaurants. All of their employees have been offered this choice and around 80% have selected to stay on flexible contracts.</p> <p>Over the past 15 years, McDonald's has been proud partners with the four UK football associations: The English Football Association; The Scottish Football Association; The Football Association of Wales; and The Irish Football Association.</p> <p>This partnership has seen them support over one million players and volunteers. In London since 2014, more than 1,000 people have attended their Community Football Days and have distributed 3,328 kits to accredited teams in the Capital. Of the 171 McDonald's restaurants within the M25, approximately 88 are twinned and actively supporting a local football club. This serves as an example of the company's willingness to confront the obesity crisis by a multitude of different approaches.</p> <p>McDonald's do this work because increasing standards will ultimately create a better experience for young footballers, leading to increased participation and retention of children and young people in sport.</p> <p>Their Community Football programme helps to increase participation at all levels. McDonald's remain absolutely committed to it and are in the final stages of planning a new programme for future years.</p> <p>Marketing</p> <p>As a business, McDonald's are committed to ensuring their marketing will continue to be responsible and will be used as a positive influence to help our customers make more informed choices. McDonald's recognise that marketing has a part to play in influencing customers' choices. They comply, and go beyond, the UK's stringent regulations on marketing to children and use their marketing to help families understand more about the range of food options they have to offer.</p> <p>McDonald's never market products classified as high in fat, salt or sugar to children in any media channel, at any time of the day. They are committed to ensuring that marketing is always responsible as well as informative, and that it reinforces positive food messages.</p> <p>In addition, they go beyond the regulations in a lot of cases. For example, when advertising a Happy Meal, they only ever do so with items such as carrot sticks, a fruit bag, milk or water to ensure McDonald's are not marketing HFSS food to children. This has been done voluntarily since 2007.</p> <p>Summary</p> <p>In the light of the above it is clear that McDonald's restaurants offer the district considerable and substantial economic benefits, are supportive of active and healthy lifestyles. They also enable customers to make informed, healthy decisions from the wide-ranging menu options available. It is important that this is acknowledged, given the assumption in draft policies 19 & 51, that all hot food takeaways uses should fall under a blanket ban if within 400m of a school. Given the policy aim – which McDonald's supports – of promoting healthier lifestyles and tackling obesity, other alternatives would be more effective than allowing blanket bans in school areas, which in turn will have negative land use consequences.</p> <p>We turn now to the main points of the objection.</p> <p>3 The 400m Exclusion Zone is Inconsistent with National Policy</p> <p>Introduction</p> <p>This section of the objection considers the proposed policy against national policy. The lack of evidence to support the policy is also discussed in the next section.</p> <p>National policy contains no support for a policy approach containing a blanket ban or exclusion zone for hot food takeaways (or indeed any other) uses. Such an approach conflicts sharply with central planks of Government policy such as the need to plan positively and support economic development, and the sequential approach that seeks to steer town centre uses – which include hot food takeaways - to town centres.</p> <p>Planware Ltd feel that restricting hot food takeaways within 400m of a school is in direct conflict with the framework as the approach is not positive, justified, effective or consistent. The policy, as currently worded, provides no flexibility in accordance with town centre sites, thus conflicting with the sequential approach. These points are further explained in this objection.</p> <p>Practical Impacts</p> <p>The practical impacts on a 400m exclusion zone around schools would have unacceptable negative land use consequences.</p> <p>Consideration should be given to school rules in terms of allowing children outside of the school grounds at lunch times. This is overly restrictive on secondary schools and colleges, where a some of pupils will be legally classed as an adult. Additionally, some college and sixth form pupils will have access to a car, making such a restriction unsound. Primary school children are not allowed outside unaccompanied.</p> <p>No consideration is given to how the 400m is measured from the access point. Guidance should be provided as to whether this is a straight line or walking distance, as this can vary greatly.</p> <p>The Framework does not support the use of planning as a tool to limit people's dietary choices. In addition to this, other E class uses can provide unhealthy products, therefore, there is limited justification for the proposed policies to focus exclusively upon hot food takeaways.</p> <p>Conflict with National Policy</p> <p>The local policy team do not appear to have fully assessed the potential impact of the policy. It essentially creates a moratorium against hot food takeaways uses leaving limited reasonable space for them to locate.</p> <p>Restricting the location of new hot food takeaway proposals through a 400m exclusion zone is not a positive approach to planning, thus failing to comply with the Framework.</p> <p>The suggested restriction within proposed Policies 19 & 51, takes an ambiguous view of hot food takeaways in relation to the proximity to all schools. The policy would apply an over-generic approach to restrict hot food takeaway development with little sound planning reasoning or planning justification. This is contrary to paragraph 11 of the Framework that advises authorities to positively seek opportunities to meet development needs of their area.</p> <p>Thus, is consistent with paragraph 81-82 of the Framework.</p> <p>Para 81 states:</p> <p><i>“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”</i></p> <p>Para 82 states:</p> <p>Planning policies should:</p> <p><i>“a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;</i></p> <p><i>b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;</i></p>
--	--	---

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”

As explained in this objection, there is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. The need for evidence is emphasised in paragraph 31 of the Framework that states that each local plan should be based on adequate, up-to-date and relevant evidence. Neither the policy nor the supporting text address this point. Policy needs to be based on evidence and the lack of evidence should highlight a red flag concerning the draft policy.

The policy is likely to be damaging to the district’s economy due to the fact that it is restricting hot food takeaways to an unprecedented level without regard to the local area or the economy. The Framework cannot be interpreted to provide generic restrictions on a particular use class. There is no basis for such a blanket ban approach in the Framework or Planning Practice Guidance. In fact, the Planning Practice Guidance emphasises that planning authorities should look at the specifics of a particular proposal and seek to promote opportunity rather than impose blanket restrictions on particular kinds of development. In the section on “Health and Wellbeing”:

Paragraph: 002 (Reference ID: 53-002-20140306) states that in making plans local planning authorities should ensure that:

“opportunities for healthy lifestyles have been considered (eg. planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation);”

Paragraph: 006 (Reference ID: 53-006-20170728) says that a range of criteria should be considered, including not just proximity to schools but also wider impacts. It does not support a blanket exclusion zone. Importantly, the criteria listed are introduced by the earlier text which states:

“Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.”

The above guidance serves to emphasise why it is important to look at particular proposals as a whole, rather than adopting a blunt approach that treats all proposals that include a Sui Generis use as being identical.

4 The Policy is Inconsistent, Discriminatory and Disproportionate

The policy aims to address obesity and unhealthy eating but instead simply restricts new development that comprises an element of Sui Generis use. Yet Class E retail outlets and food and drink uses can also sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables, and hot food from a restaurant unit can be delivered to a wide range of locations, including schools. This means that the policy takes an inconsistent approach towards new development that sells food and discriminates against operations with an Sui Generis use. It also means that the policy has a disproportionate effect on operations with an Sui Generis use.

The test of soundness requires that the policy approach is “justified”, which in turn means that it should be the most appropriate strategy when considered against the reasonable alternatives and based on proportionate evidence (paragraph 35 of the Framework).

Given the objectives of the policy, it ought to apply equally to all relevant food retailers. It is unclear how the policy would be implemented and work in a real life scenario.

The table below shows the kind of high calorie, low nutritional value food that can be purchased from a typical A1 high street retailer at relatively low cost. It is contrasted with the kind of purchase that could be made at a McDonald’s. The evidence provided at **Appendix 1** confirms that 70% of purchases by students in the school fringe were not purchased in a hot food takeaway. ¹

Company	Snack or meal	Salt (g)	Fat (g)	Calories (kcal)	Price (£)
McDonald's	Apple and Grape fruit bag	0.0	0.1	48	49p
McDonald's	Garlic Mayo chicken wrap	1.3	11.0	345	2.99
Greggs	Sausage roll	1.6	22.0	317	90p
Greggs	Cheese and Onion bake	1.6	30.0	436	1.35
Costa Coffee	Nutty flapjack	0.1	23.2	425	1.70
Costa Coffee	Ham and Cheese panini	2.5	13.5	427	3.95

If the policy is to be based on Use Classes, then the proposed policy should place restrictions on other use classes in addition to hot food takeaways. In fact, by restricting hot food takeaway uses only, the policy would encourage food purchases at other locations and allows for the overarching objectives to be compromised.

Finally, it is important that for the majority of days in the year (weekends and school holidays combined) schools are not open at all. Research by Professor Peter Dolton of Royal Holloway College states that “At least 50% of the days in a year kids don’t go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school.”²

For the minority of the year when schools are open, it is important to recognise that many schools have rules preventing children from leaving the school grounds during the school day, and in any event proximity to schools has no conceivable relevance outside of the particular times when children are travelling to or from school in circumstances where their route takes them past the development proposal.

The policy’s blanket approach fails to acknowledge that the opportunity for children to access hot food takeaways, as part of a school day, is extremely limited. The complete ban is wholly disproportionate to the circumstances when the concern underlying the policy might become a more prominent matter. Only limited purchases of food are made at hot food takeaways on journeys to and from school. Further details are set out in **Appendix 2**.

5 The Policy is not Justified because of a Lack of an Evidence Base

The test of soundness requires policy to be evidence based. There is no evidence of any causal link between the presence of hot food takeaways within 400m of a school. Also, with no basis to indicate over-concentrated areas gives rise to obesity or poor health outcomes, justification is evidently incomplete. In fact, the studies that have considered whether such a causal connection exists [between proximity of a hot food takeaway and poor health outcomes], have found none.

Public Health England (PHE), which is part of the Department of Health and Social Case, expressly accept that the argument for the value of restricting the growth in fast food outlets is only “theoretical” based on the “unavoidable lack of evidence that can demonstrate a causal link between actions and outcomes.”³

A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation ‘did not find strong evidence at this time to justify policies related to regulating the food environments around schools.’ It instead highlighted the need to ‘develop a higher quality evidence base’.⁴

The range of US and UK studies used to support many beliefs about obesity, including the belief that the availability of fast food outlets increased obesity, was comprehensively reviewed in papers co-written by 19 leading scientists in the field of nutrition, public health, obesity and medicine. Their paper “Weighing the Evidence of Common Beliefs in Obesity Research” (published in

the Critical Review of Food, Science and Nutrition (Crit Rev Food Sci Nutr. 2015 December 6; 55(14) 2014-2053) found that the current scientific evidence did not support the contention that the lack of fresh food outlets or the increased number of takeaway outlets caused increase obesity (see pp16-17 of the report). There appears to have been no critical assessment of whether the underlying evidence supports the proposed policy approach. In this context, it is important to consider the evidence from the Borough of Waltham Forest, which introduced a school proximity policy in 2008 – about a decade ago. Over that period, the Public Health England data for the borough shows that there has been no discernible impact on childhood obesity rates – with these worsening in recent years. The borough’s Health Profile for 2017 records childhood obesity (year 6) at 26.1% up from 20.3% in 2012, the year London hosted the Olympic Games. While it is accepted that the causes of obesity are complex, it is clear that the school exclusion zone policy had no discernible effect in Waltham Forest. More research and investigation is needed before such a policy approach can be justified by evidence.

6 Similar Policies Have Been Found Unsound When Promoted in Other Plans
The lack of evidence between proximity of takeaways to local schools and its impact on obesity has been confirmed in a number of planning decisions. In South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating ‘the evidence base does not adequately justify the need for such a policy’, and due to the lack of information, it is impossible to ‘assess their likely impact on the town, district or local centres’.⁵ Similarly, research by Brighton & Hove concluded that ‘the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day’.⁶ The recent Inspectors response to the London Borough of Croydon (January 2018) regarding a similar prohibition on hot food takeaways, (where a similar campaign to persuade takeaway proprietors to adopt healthy food options existed) confirmed that the councils own ‘healthy’ plans would be stymied by the proposed policy, as would purveyors of less healthy food. The policy failed to distinguish between healthy and unhealthy takeaway food, and “confounds its own efforts to improve healthiness of the food provided by takeaway outlets” and failed to “address the demand for the provision of convenience food”. The Inspector concluded that because the reasons for the policy do not withstand scrutiny, they must be regarded as unsound. The inspector at Nottingham City Council stated “*There is insufficient evidence to support the link between childhood obesity and the concentration or siting of A3, A4 and A5 uses within 400m of a secondary school to justify the criterion of policy LS1 that proposals for A3, A4 and A5 uses will not be supported outside established centres if they are located within 400m of a secondary school unless it can be clearly demonstrated that the proposal will not have a negative impact on health and well-being the criterion and justification should therefore be deleted/amended*”. The inspector at Rotherham stated “*Policy SP25 sets out various criteria against which proposals for hot food takeaways will be assessed. One of the criteria is designed to prevent hot food takeaways within 800 metres of a primary school, secondary school or college when the proposed site is outside a defined town, district or local centres. Having carefully considered the material before me and the discussion at the Hearing I do not consider there is sufficient local evidence to demonstrate a causal link between the proximity of hot food takeaways to schools and colleges and levels of childhood obesity. Although I accept that levels of childhood obesity need to be tackled by both local and national initiatives I do not consider there are sufficient grounds at the present time to include this particular aspect of land use policy in the RSPP*”. In Guildford, the inspector stated “*Finally, the submitted Plan contains a requirement common to Policy E7 Guildford town centre, E8 District Centres and E9 Local Centres and isolated retail units that resists proposals for new hot food takeaways within 500 metres of schools. However, the evidence indicates that childhood obesity in Guildford is lower than the average for England. Childhood obesity may be a product of a number of factors, not necessarily attributable to takeaway food; takeaways often sell salads as well as nutritious foods; not all kinds of takeaway food are bought by children; children have traditionally resorted to shops selling sweets and fizzy drinks, which would be untouched by the policy; and the policy would have no bearing on the many existing takeaways. In this context there is no evidence that the requirement would be effective in safeguarding or improving childhood health. It would be an inappropriate interference in the market without any supporting evidence and would therefore be unsound*”. *The proposed 400m school exclusion zone is a policy that we cannot agree to. The proposed approach is in direct conflict with the Framework. As mentioned in the above text, there is enough reputable information to demonstrate a current evidence base that fails to demonstrate the link between fast food and school proximity. There is also a clear absence of evidence to suggest restricting hot food takeaway uses will lead to healthier lifestyles or influence an individual’s dietary choice.*

7 Alternative Approaches
Planware Ltd considers there is no sound justification for the school exclusion zones within policies 19 and 51. These should therefore be removed to provide consistency and to abide by the Framework. Planware Ltd would welcome and support proposals for a wider study of the causes of obesity and their relationship with development proposals, including examination of how new development can best support healthy lifestyles and the tackling of obesity. When a cogent evidence base has been assembled, this can then inform an appropriate policy response. That time has not yet been reached. It is considered until such a time has been reached, the exclusion zone should be removed.

8 Conclusion
McDonald’s supports the policy objective of promoting healthier lifestyles and tackling obesity. It does not consider that the approach in proposed Policies 19 and 51 is a sound way of achieving those objectives. The underlying assumption in the policy is that all hot food takeaways (and any restaurants with an element of takeaway use) are inherently harmful to health. In fact, this is not supported by evidence. McDonald’s own business is an example of a restaurant operation which includes takeaway but which offers healthy meal options, transparent nutritional information to allow healthy choices, and quality food and food preparation. The business itself supports healthy life styles through the support given to its staff and support given to football in the communities which the restaurants serve. In addition, the policy fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and wellbeing. McDonald’s own business is an example of a restaurant operation that supports sustainable development through the use of renewable energy, the promotion of recycling, the use of energy and water saving devices. The economic benefits of its restaurants in supporting town centres and providing employment opportunities and training are substantial, and important given that improved economic circumstances can support improved health. The policy fails to acknowledge that food choices which are high in calories and low in nutritional value are made at premises trading with Class E consents and can be delivered from the latter. The policy makes no attempt to control these uses. For the reasons given in this objection the proposed policy is very clearly inconsistent with government policy on positive planning, on supporting economic development and the needs of businesses, on supporting town centres, and on the sequential approach. There is no justification in national policy for such restrictions to be applied to hot food takeaways. The effect of the policy had it existed in the past would have been to exclude restaurants such as McDonald’s from major commercial and tourist areas. For the reasons given in this objection the proposed policy lacks a credible evidence base, and similar policies have been found to be unsound by inspectors who have examined other plans. In the one London Borough that has had a similar policy, concerning a school exclusion zone, for around a decade (LB Waltham Forest). It has had no discernible effect on obesity levels, which have in fact increased since its introduction.

		<p>Given the overall objective of improving lifestyles and lowering obesity levels, restrictive policy regarding hot food takeaway development is a narrow-sighted approach. There is no mention of other possible reasons behind the national high levels of obesity. To discriminate against hot food takeaways alone is worrying and using the planning system to influence people’s daily lifestyle choices is not acceptable.</p> <p>¹ The School Fringe: What Pupils Buy and Eat From Shops Surrounding Secondary Schools, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University.</p> <p>² Peter Dolton, Royal Holloway College, University of London & Centre for Economic Performance, London School of Economics, Childhood Obesity in the UK: Is Fast Food a Factor? http://www.made.org.uk/images/uploads/2_Prof_P_Dolton_presentation.ppt</p> <p>³ Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013</p> <p>⁴ J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.</p> <p>⁵ Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing & Planning Inspector, The Planning Inspectorate.</p> <p>⁶ Brighton & Hove City Council & NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 30, September 2011</p> <p>[See Appendix 8 for Appendix 1 – Food in the School Fringe Tends to be Purchased in Non-Hot Food Takeaway Properties and Appendix 2 – Food Purchases made on School Journeys]</p>
	Policy 20. Local shops and services	
Tim Catchpole, Mortlake with East Sheen Society	Policy 20. Local shops and services	We agree with the policy to resist the closure of pubs!
Andrew Barnard	Policy 20. Local shops and services	Policy 20 - the Council should reduce business rates which are an impediment to small operators opening shops and other commercial premises which in turn could encourage local enterprise and employment
	Increasing jobs and helping business to grow and bounceback following the pandemic	
David Marlow		Housing schemes at Greggs Bakery site in Twickenham and St Clare's Business Park have been refused (the latter by Councillors despite officer recommendation for permission) on grounds of insufficient employment/industrial use. Whilst recognising this need there should be some flexibility where in largely residential areas. Especially Greggs because of difficulty of access - this site now stands a derelict eyesore.
Henry Carling, Kandahar (Jackson Square) Ltd	Chapter 19, Policies 21 to 24 (inclusive) and related supporting text	<p>We have some concerns that the emerging employment policies are too 'binary' in their crafting (i.e. separating out office and industrial uses). The Council's latest evidence (as referred to above) [see comment in relation to paragraph 19.40] and parts of the supporting text sets out that there is a need for flexibility in the provision of uses and floorspace. Taking a binary policy approach as currently proposed does not support this objective. This could result in an inability for the Council to be responsive to the borough's employment/economic needs and also hinder investment in existing employment premises and sites, particularly smaller sites. This is because it does not necessarily reflect how some existing employment sites operate or what some sectors that the Council is seeking to support actually need - including those in the creative industries. Many creative industries and SMEs operate in a way which requires a mix of uses which cut across the office and industrial uses. This is set out in Paragraph 3.11 of the LBRuT Employment Land and Premises Needs Assessment December 2021 which states that:</p> <p>'We also see some small units being used by creative industries who use the units in flexible ways e.g. part manufacturing, part office space, and warehousing.'</p> <p>Other SMEs may need a combination of office, research and development, light industrial and warehousing. The current approach therefore has the potential to hinder the ability to respond appropriately to the needs of businesses looking for space which provides for flexibility in terms of the uses to be accommodated. Such an approach could also discourage investment in the retention and upgrading of existing premises to provide a modern working environment and secure improvements such as in energy and water efficiency. These are principles which underpin the 'Circular Economy' objectives of the London Plan 2021 but there appears to be limited recognition of the role that refurbishment and intensification of existing sites can play but rather assumes that proposals will primarily be for new development or redevelopment.</p> <p>It is noted that the policies do not explicitly support proposals which facilitate the retention of existing firms where their operational needs have changed such that they require a mix of uses which cross the office/industrial divide.</p> <p>It is requested that the Council considers amendments to the wording of the employment policies and supporting text policy which provides for a more flexible approach to their use for employment purposes. Taking such an approach would provide greater certainty for site owners in being able to offer smaller premises which can be used flexibly and therefore support the viable operation of a site. This would be a greater incentive for investing in the refurbishment of the existing stock to improve the quality of the workspace and the potential to increase the number of employees that can be accommodated/supported (recognising the growth in an element of homeworking), their energy efficiency (supporting both climate change and affordability objectives) and increase the longevity of the stock in line with Circular Economy principles. This approach would also provide certainty for occupiers who may, for example, require premises that provide for equal amounts of office and warehousing, office and light industrial or light industrial and research and development uses. This would avoid both owners and occupiers having to determine whether activities were considered to be primary and ancillary uses and avoid the potential for units to lie empty or result in businesses going outside of the borough. It would also provide flexibility to achieve appropriate intensification of employment use on small, constrained sites.</p> <p>To assist, the Council could take a similar approach to that taken in the adopted Camden Local Plan 2017. The approach taken by Camden seeks to protect premises or sites of less than 1ha that are suitable for continued business use and in particular premises for small businesses, business and services that provide employment for borough residents and those that support the functioning of the local economy. Use of the phrase 'business use' would provide the flexibility being sought.</p>
	Policy 21. Protecting the Local Economy (Strategic Policy)	
Kevin Scott, Solve Planning Limited on behalf of Port Hampton Estates Limited	Employment Policies (Policies 21, 23 and 24)	<p>Employment policies relevant to the island are as follows:</p> <p>Policy 21. Protecting the Local Economy (Strategic Policy)</p> <p><i>A. The Council will seek to retain and attract investment from existing and emerging sectors to support the existing business base and create a diverse and enterprising local economy. New development proposals will be supported which:</i></p> <p><i>1. Protect existing employment floorspace for office and industrial use, with a no net loss approach. Take an employment-led approach to any redevelopment to meet local economic needs through intensification of the existing employment floorspace.</i></p> <p>...</p> <p><i>4. Provide a range of commercial unit types, that are flexible and adaptable to changing needs, suitable for subdivision and configuration for new economic uses and activities for a range of occupiers;</i></p> <p>Policy 23. Office</p> <p><i>Retention of offices</i></p>

		<p><i>A. There is a presumption against the loss of office floorspace in all parts of the borough. Proposals which result in a net loss of office floorspace will be refused. Any redevelopment proposals are required to contribute to a net increase in office floorspace. Any refurbishment of existing office floorspace should improve the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) as set out in London Plan Policy E1.</i></p> <p>Policy 24. Industrial land</p> <p><i>Retention of industrial space</i></p> <p><i>A. There is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused. Any redevelopment proposals are required to contribute to a net increase in industrial floorspace. Any refurbishment of existing industrial floorspace should include traditional formats along with workspace for light industrial, through intensification as set out in London Plan Policy E7 part A.</i></p> <p>While we support the principles included in these policies, they need to take account of site specific conditions that may not enable reprovision of employment space or provision for a range of types of commercial units in the way envisaged by these policies. This is particularly the case on sites such as Platt’s Eyot where access arrangements and site conditions mean that the opportunities to provide for a range of uses is more limited. These limitations on some sites should be recognised in these policies or in the site specific text and final policy for Platt’s Eyot.</p>
Tim Catchpole, Mortlake with East Sheen Society	Policy 21. Protecting the Local Economy (Strategic Policy)	We note the aim to make the use of office space more efficient but see little about how this will be done particularly in the context of occupational changes accelerated by the pandemic. We note the intended continuation of the Article 4 direction with regard to PDRs to residential use.
Theresa Oddelm, The Royal Parks	Policy 21 Protecting the Local Economy	Protection of the local economy is supported by The Royal Parks. However, any increase in numbers of workers in the area could increase footfall within both Richmond and Bushy Parks. We are keen to work with the Borough to ensure that the Parks are protected and any additional pressure on them effectively mitigated, so they can continue to provide the same experience for the additional visitors.
Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Policy 21: Protecting the Local Economy (Strategic Policy)	<p>This policy should reflect the wording of London Plan Policy E1E which refers to the protection of existing VIABLE office floorspace capacity should be retained and supported. London Plan Policy E1E also refers to "facilitating the redevelopment, renewal and re-provision of office space where viable and releasing surplus office capacity to other uses".</p> <p>Evidence:-</p> <p>A report has been prepared by Bray Fox Smith which is appended to these representations. This concludes that there is a significant supply of high quality office accommodation in Richmond with new stock coming to the market shortly.</p> <p>This report confirms that supply is outstripping demand and that quality office space is being secured with secondary space not being taken up.</p> <p>This report concentrates on the marketing efforts for Onslow Hall, a listed office building in Richmond which has had 20 viewings over two years but because the space is dated, unflexible, offers low specification and is not DDA compliant, none of the enquiries have led to a lease being signed and the building remains largely vacant.</p> <p>This reflects the difficulties faced by unflexible accommodation which does not provide high standards of workplace accommodation.</p> <p>As a result, Policy 21 should more closely reflect the wording of the London Plan policy which recognises that some office space is no longer viable and that there will be instances where there is surplus office capacity.</p> <p>[See Appendix 9 for the Onslow Hall market update]</p>
Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	Policy 21. Protecting the Local Economy (Strategic Policy)	<p>This policy does not recognise that there are important sectors of the economy which provide valuable employment and socio-economic advantages beyond "industry" and "office" uses and which may not be most appropriately located on "business" areas, for example in the leisure and tourism sectors. The policy should be revised to recognise such development and re-development possibilities.</p> <p>Change considered necessary: ADD asterisk after A[2] ... "Other employment floorspace*..." Add footnote to policy: : " * employment floorspace shall in this context include floorspace in other sectors of the economy beyond just office and industry, for example leisure, tourism, as appropriate"</p>
Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 21 - Protecting the Local Economy (Strategic)	<p>London Plan (2021) Policy E4 seeks to ensure a sufficient supply of land and premises in different parts of London in order to meet current and future demands for industrial and related functions, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution.</p> <p>The London Plan separates London’s land and premises for industry, logistics and services into three categories: Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Non-Designated Industrial Sites. SIL is described within the London Plan as ‘<i>London’s largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London’s economy</i>’ and London Plan policy provides strategic protection of these sites due to their critical role to the effective functions of London’s economy. In contrast, LSIS have particular local importance for industrial and related functions and London Plan policy requires these designations to be based on evidence from strategic and local demand assessments.</p> <p>Prior to the adoption of the London Plan (2021) the Secretary of State (‘SoS’) required that Policy E4 was modified to remove the requirement for ‘no net loss’ of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. It was identified by the SoS that the previous aspiration to ‘retain’ sufficient industrial capacity ‘may not be realistic’ and is inconsistent with the NPPF which importantly requires “<i>that sufficient land of the right type is available in the right places and at the right time to support growth and innovation.</i>” (Emphasis added). The ‘no net loss approach’ was therefore removed from the adopted London Plan Policy E4, which now requires that a ‘<i>sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained</i>’.</p> <p>Draft Local Plan Policy 21 seeks to apply a ‘no net loss’ approach to employment floorspace and seeks to intensify existing employment use. Draft policy 21 is therefore contrary to the London Plan (2021) and NPPF, and the Council should seek to align the policy wording in order to retain employment ‘capacity’ that is identified as being appropriate for supporting continued employment use whilst also taking into account employment type and quality.</p> <p>Notwithstanding this, it is also noted that there are no Strategic Industrial Locations (SIL) designated in Richmond. As such, any employment designation in the borough serves less of a strategic role and, in accordance with the London Plan, should “<i>be fit for purpose</i>”, located in sustainable locations and, for industrial uses, be “<i>accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport</i>”. We argue that Greggs meets none of this criteria – being in a residential area with low footfall, with a PTAL rating of 2, located far from the strategic road network and being in an existing condition where full redevelopment and by associated high capital costs are required for any use (affecting the viability of any sole employment scheme).</p> <p>The supporting text of draft Policy 21 also sets out that sites that are located within mixed-use areas due to historic development patterns do not provide justification for a change of use and it is considered that these land use conflicts can be mitigated. It further states that “<i>constraints such as narrow access, which have been managed by existing occupiers and therefore do not prevent any future or continued employment use</i>”. We would dispute this in the case of the Greggs site, on the basis that –</p> <ol style="list-style-type: none">1. Greggs has already relocated to another site due the challenges they experienced at the Twickenham site. As such, it has been demonstrated that the highways and amenity impacts of the Greggs Site cannot be mitigated;2. A future employment use based on the full re-provision of the existing floorspace (circa 7,082 sqm GIA, as currently required under draft Policy 21) would give rise to the same impacts;3. The accompanying text acknowledges that “<i>changes to ways of working, servicing and delivery do mean the ways businesses operate are changing.</i>” This includes a requirement for 24 hour access and operations, large amount of yard space and access for more frequent HGVs – which would all affect the amenity of adjoining residential properties and reduce the site’s appeal to

		commercial occupiers. We also consider that the full re-provision of the existing commercial floorspace on site would be unviable and result in a poor layout which would comprise the appeal to future tenants – for example a failure to meet their requirements for yard space, HGV access and include high ceiling heights in all buildings which further invalidates the current wording of draft Policy 21.
Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Paragraph 19.3	<p>Evidence:-</p> <p>London Plan Policy E1i states that "the redevelopment, intensification and change of use of surplus office space to other uses including housing us supported".</p> <p>London Plan paragraph 6.1.7 states that "surplus office space includes sites and/or premises where there is no reasonable prospect of these being used for business purposes. Evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply and evidence of vacancy and marketing".</p> <p>Suggested amendment:-</p> <p>This paragraph (19.3) should be amended to refer to protecting "viable employment land within designated employment areas". This would better reflect the suporting paragraphs of London Plan Policy E1.</p>
Heather Mathew, Richmond Council for Voluntary Service (CVS)	3 suggested key areas for inclusion - 2) Property	<p>Office accommodation Affordable and conveniently located local office accommodation has long been a challenge in the borough, and the needs of the sector have not changed as a result of the pandemic. The sector would concur with the needs analysis cited at 19.54 “rent levels for co-working spaces in the borough were quite high. The result of this may be that there is segment of users who are priced out of this market in the borough” and supports “ the refurbishment and upgrade of outdated stock to better facilitate changing working practices” (19.4) and ensuring “ a range of employment and training opportunities available to local residents” (pg 18)</p> <p>Whilst services adapted to work from home, and online, there is still a need for in person services, and co located office accommodation that offer flexible work spaces and hybrid delivery. “ There is potential to create a more participatory inclusive and community focused economy with shared workspaces that enable collaboration, knowledge exchange and increase business productivity” (4.5) As a significant local employer the voluntary sector has a role to play in “increasing jobs and helping..... to grow and bounce back following the pandemic” (19 Pg 198) and, like business, has a need for affordable, flexible local workspace for its office space. It is essential that alongside those of local business, the council recognises the accommodation needs of the VCS in this plan (not for profit is only referred to once at 19.50) and acknowledges its role as both an employer and a contributor to economic growth.</p> <p>A VCS Hub There has been a long- held shared ambition with the council for a voluntary sector hub, or hubs, in the borough offering affordable office and meeting spaces for the VCS. The development of the Integrated Care System would further support this. A VCS hub has been talked about and researched by the council and its partners for many years, but has always been bypassed in favour of other facilities (The Exchange for example on the The Old Post Office site) Without any specific commitment in this local plan the same will be true for the next 15-20 years at a time when rising costs and lack of affordable space will further marginalise the local voluntary sector and limit its ability to deliver and expand services to the community.</p>
Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Paragraph 19.4	<p>This paragraph states that evidence is showing that changing office working practices is enabling more efficient use of space. There is also reference to refurbishment and upgrading of outdated stock.</p> <p>Suggested amendment:-</p> <p>Whilst we agree with the principle of upgrading office stock, there should be a recognition that listed buildings provide constrianed facilities and layout options (they are not easily adaptable to changing business needs and operational requirements) which do not meet the newer requirements for industrial/workshop style provision which is also attracting emerging office needs.</p> <p>The following wording should be added to the end of this paragraph:</p> <p>"Where office space cannot be successfully upgraded then alternative viable uses should be considered".</p>
Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Paragraph 19.7	<p>This relates to affordable and flexible workspace. In the case of some listed buildings, the provision of workspaces which can respond to changing business needs and create future proofed places cannot be provided with harm to the significance of these buildings.</p> <p>Suggested amendment:-</p> <p>The following wording should be added to this paragraph "The Council recognises that some listed buildings may not be adaptable to be able to provide affordable and flexible workspace".</p>
	Policy 22. Promoting jobs and our local economy	
Theresa Oddelm, The Royal Parks	Policy 22 Promoting jobs and our local economy	We welcome the note within the policy's supporting text that the Royal Parks offer opportunities for economic spin-offs as well as contributing to supporting a high quality and unique environment. It is important that any resultant increase in footfall within the Parks is effectively mitigated through policy support for the work that The Royal Parks does to protect and conserve them.
Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Policy 22	<p>Policy 22: Promoting jobs and our local economy This policy sets out the requirements for high standards of workspace which include adequate widths of doorways and corridors, clear fleible floorplates, level thresholds, inclusive access, good connectivity, facilities including showers, changing rooms etc.</p> <p>These requirements for high standards of workspace should be considered within Policy 23 which relates to protecting existing offices.</p> <p>No amendments are suggested to this policy.</p>
Tim Catchpole, Mortlake with East Sheen Society	Policy 22. Promoting jobs and our local economy	We welcome the intended support for TV, film studio capacity and river-related/dependent industries.
James Sheppard, CBRE, on behalf of LGC Ltd	LGC site – introduction and principle of mixed use development	<p>Introduction:</p> <p>We write on behalf of our client LGC Ltd. (hereafter referred to as ‘LGC’) in response to consultation on the Draft Local Plan Pre-Publication Version (Regulation 18), hereafter referred to as the ‘draft local plan’.</p> <p>LGC is the UK National Measurement Laboratory and Designated Institute for chemical and biomeasurement. It has also been home to the UK Government Chemist function for more than 100 years. The company’s headquarters is located on Queens Road in Teddington (hereafter referred to as ‘the site’). A site plan is enclosed (see Appendix 1).[See Appendix 10]</p> <p>On behalf of our client, we write to reinforce our previous advocacy for redevelopment of the site for a mix of employment and residential uses, through specific mixed-use allocation. LGC is committed to remaining in Teddington, continuing its longstanding legacy of investment within London Borough of Richmond upon Thames (LBRuT). This is however dependent upon being able to develop a modern and fit-for-purpose new headquarter building at its Queens Road site. LGC has prioritised a plan-led approach to mixed-use redevelopment over the past six years, and through two separate Local Plan consultation processes. In addition, LGC has recently participated in a pre-application meeting with the Council to discuss an indicative mixed-use redevelopment scheme. The time and resource invested to date, promoting this vision, demonstrates a clear intent to secure a future for LGC in Teddington.</p> <p>A truly comprehensive mixed-use enabling development on the site would secure a high-quality office and laboratory headquarter building for LGC in Teddington, whilst also delivering a ‘third-party’ employment building(s) to accommodate new businesses and retain investment potential in Teddington, whilst delivering affordable workspace and space for SMEs. This would result in a modern breadth of employment mix on site, re-providing and enhancing the existing net employment space on site.</p> <p>Productive and pragmatic dialogue and engagement with the Council, in respect to the site, is crucial to protect and enhance LGC’s important scientific operations and ultimately its future in Teddington.</p>

		<p>This consultation response follows previous representations submitted to LBRuT on behalf of LGC, in respect of the now adopted Local Plan (July 2018 and March 2020). Previous representations presented to the Council on behalf of LGC were dated 15th February 2017, 18th August 2016 and 28th January 2016. These representations supported a mixed-use allocation at the site, most importantly for a modern, fit-for-purpose headquarters premises, alongside much needed housing, including affordable housing. In addition, representations were also submitted in respect to the Direction of Travel consultation document and Call for Sites, dated 18th March 2020.</p> <p>Since the submission of our previous representations, LGC’s existing facilities in Teddington continue to become increasingly unsustainable and uneconomical. In part, this is due to far reaching changes to customer requirements and continuing evolution and miniaturisation of scientific techniques. The pandemic has exacerbated these challenges, with a need to provide high-quality space for its highly skilled employees, seeking to retain the best talent. It is worthy of note, that approximately 50 per cent of staff reside locally within LBRuT.</p> <p>Due to the original design and construction methods used, the building has a significantly higher operating cost than any other UK LGC site. The mechanical and electrical equipment (plant) has reached the end of its sustainable lifespan. It is evident that the buildings are wholly unsustainable into the medium term. Further, increasingly high operating costs and inefficiencies are in large part due to the facility originally being designed and built for wet chemistry laboratory operations. Over time, substantial changes to scientific methods are evident, particularly with the introduction of instrument based analytical methods (e.g. liquid & gas chromatography and mass spectrometry etc). The site in its current form is now constraining LGC’s operating model in Teddington, contrary to facilitating the delivery of the LGC’s wider business objectives and crucial national and global roles in measurement science.</p> <p>The site remains an important facility to LGC with its skilled local workforce. It is LGC’s intention to retain the site as its group headquarters and part of its UK laboratory operations. However, the cost of upgrading the facilities is extremely high and a large portion of the site is surplus to LGC requirements.</p> <p>The draft Local Plan, para. 19.8 clearly sets out the Council’s broad support for LGC, stating “the borough is home to nationally important scientific institutions such as the National Physical Laboratory (NPL) and head office of the Laboratory of the Government Chemist (LGC). As such, scientific, innovation and research, provision of incubator units and laboratories will be supported”. It has been demonstrated through the preparation of an indicative scheme, presented to the Council, that redevelopment of the site can satisfy no-net loss of employment floorspace, provide a meaningful contribution to the Borough’s housing land supply, whilst delivering a policy compliant number of affordable homes. It is well documented that the Council is severely lacking in respect to delivery of affordable homes.</p> <p>2. Indicative scheme:</p> <p>An indicative scheme has been prepared that provides for a sound and sensitive balance of development, re-providing and enhancing net employment floorspace, including for affordable workspace and provision for SMEs, providing new high-quality residential development, and a proposed policy compliant level of affordable housing. The indicative scheme, as shared with planning officers, also incorporates a sensitive design in respect to heights and massing, responding positively to its surrounding urban design context, whilst ensuring the inclusion of high-quality green space and landscaping, opening up the site to promote permeability and active travel.</p> <p>In broad terms, the indicative scheme, when compared with net existing employment floorspace of c.10,000sqm, could include:</p> <ul style="list-style-type: none">- Approximately 11,000sqm of new employment floorspace (across new LGC building and the third-party building)- Approximately 279 homes, including up to 50 per cent affordable housing- Active, outward facing site boundaries, integrating the site into the surrounding suburban context whilst enhancing site permeability- Publicly accessible green open space. <p>3. Principle of mixed-use redevelopment</p> <p>A land-use allocation for mixed-use enabling development would go much further than simply providing a new, high-quality, fit-for-purpose office and laboratory facility to sustain LGC in the borough into the long-term. The site is currently under-developed, under-used and underoccupied. The effective use of this sustainable brownfield site would be assured through the development of a significant quantum of new Grade A office/employment space, separate to that developed for LGC’s new headquarters building. New, much needed employment floorspace would serve to provide accommodation for a range of occupiers including start-ups and expanding/relocating businesses within LBRuT. It would also be proposed for this to include a policy compliant level of affordable workspace. Enabling development as part of the site through the building of new homes must also form part of any mixed-use allocation. New homes would not only serve to subsidise high-quality new commercial development on site, but also provide an appropriate means of delivering much needed affordable homes for the borough.</p> <p>The draft Local Plan sets out strategic policies, notably including the optimisation of land and resources by ensuring new development takes place on previously developed land and in sustainable locations, providing a variety of opportunities for affordable and adaptable workspaces encouraging opportunities to work locally, whilst crucially increasing jobs and helping business to grow and bounce back following the pandemic. A mixed-use development would successfully consolidate an inefficient series of buildings and make more efficient use of the wider site, thereby increasing the numbers of jobs on site from approximately 250 to approximately 850, modernising an obsolete and outdated building to one that is fit for modern science and business, retain LGC within the borough protecting highly skilled employees, provide new high-quality space for incoming or expanding businesses, whilst providing approximately 150 new affordable homes.</p> <p>A mixed-use redevelopment is proposed, in part, to serve as enabling development to part cross-subsidise the delivery of a new building for LGC. However, crucially, a mixed-use proposal ensures a breadth and depth of planning benefit for the community of Teddington and the wider borough of LBRuT.</p> <p>The supportive context for mixed-use redevelopment is reflected at national policy level. The National Planning Policy Framework (NPPF) actively seeks to promote effective use of land. Paragraph 120 directs that planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed use schemes; give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs; and promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. A mixed-use allocation would truly serve to optimise the use of this highly sustainable brownfield site.</p> <p>In our strong view, the site lends itself well to a mix of employment and residential uses. The site can provide for a comprehensively master planned, sustainable, mixed-use development that retains LGC in the borough, provides new employment space for new, expanding and relocating businesses and delivers much need homes. Importantly, it is clear from the recent under-delivery of affordable housing that the site could serve as a productive and effective contributor to the Council’s affordable housing land supply over the forthcoming plan period.</p> <p>[See comment relating to employment, comment in relation to affordable homes, comment in relation to urban design, and comment relating to the summary]</p>
Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	Policy 22. Promoting jobs and our local economy	<p>This policy continues to adopt a very narrow view of "employment floorspace" ignoring that much employment takes place in and is reliant upon sectors such as retail, health. leisure and tourism. The important contribution that other sectors of the economy can make should be recognized.</p> <p>Change considered necessary: ADD A "[8] leisure and toursim sectors"</p>
	Policy 23. Offices	
Faye Wright, Forward Planning and Development	Policy 23	Policy 23 states that:"A There is a presumption against the loss of office space in all parts of the borough".

on behalf of BMO Real Estate		<p>This policy should reflect London Plan Policy E1 and the requirements of Policy 22 so that existing unviable office space which cannot be adapted to provide high standards of workspace is not restricted by the policy.</p> <p>The requirements set out within Policy 22 should be considered within Policy 23 which relates to protecting offices.</p> <p>Suggested amendment:-</p> <p>The wording of policy 23 should reflect London Plan Policy E1 and the requirements of Policy 22 so that existing unviable office space which cannot be adapted to provide high standards of workspace is not restricted by the policy.</p> <p>It is not considered that Policy 23 is sufficiently flexible to recognise that there will be instances where unviable office floorspace should be considered for alternative uses.</p>
Tim Catchpole, Mortlake with East Sheen Society	Policy 23. Offices	We note the presumption against the loss of office space. It is not clear how the forecast shortfall in office space (100,000 m² for the period 2019-2039) and the aim to achieve 40,000 m² fit in with post-pandemic uncertainties surrounding demand.
Nina Miles, GLA on behalf of Mayor of London	Policy 23. Offices	Policy 23 seeks to protect office floorspace and direct major new office development into the five town centres and smaller scale office development to Key Business Areas. E1 LP2021 supports the focus of new office development in town centres however, the Key Business Areas should be supported by improvements to walking, cycling and public transport connectivity and capacity.
Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Paragraphs 19.18 and 19.19	<p>These paragraphs make reference to marketing evidence being provided and we support the inclusion of this within the supporting paragraphs. We consider that reference should be made in paragraph 19.19 to listed buildings and a recognition that there may be heritage benefits arising from a change of use from offices to secure the long term viable future of a listed building.</p> <p>Suggested amendment:-</p> <p>We consider that reference should be made in paragraph 19.19 to listed buildings and a recognition that there may be heritage benefits arising from a change of use from offices to secure the long term viable future of a listed building.</p>
	Policy 24. Industrial land	
Daniella Marrocco, ROK Planning on behalf of Shurgard UK Ltd	Policy 24. Industrial land	<p>On behalf of Shurgard UK Ltd (‘Shurgard’), we are writing to submit representations in relation to the London Borough of Richmond upon Thames Pre-Publication Draft Local Plan (Regulation 18). A Shurgard storage facility facilitates significant employment generation and further employment benefits. Analysis of the existing user demographic of Shurgard’s London portfolio demonstrates that 15-20% of customers are business customers, with a majority being small, start-up or local businesses and small medium enterprises (SME). As such, a Shurgard facility is considered a key economic benefit which asissts local businesses, especially SMEs, flexibility and growth.</p> <p>These representations relate specifically to suggested amendments to the current drafting of Policy 24 Industrial Land and Policy 25 Affordable, Flexible and Managed Workspace.</p> <p>The purpose of these representations therefore is to ensure the draft local plan can be considered ‘sound’ with reference to the relevant tests set out in paragraph 35 of the NPPF. Specifically, the test of compliance with national guidance / strategic development plan is referred to.</p> <p>This will ensure the final draft local plan will accurately reflect the relevant provisions of the London Plan, particularly with regard to ensuring sufficient and suitable supply of land for employment uses is delivered / maintained where wider redevelopment via mixed-use intensification and co-location is planned.</p> <p>Policy 24 Industrial Land</p> <p>Part A of Policy 24 states that “<i>there is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused</i>”. In his Directions to the Mayor, in relation to the Intend to Publish London Plan, the Secretary of State instructed the removal of the requirement of “no net loss” to existing industrial land as this was considered “an over-restrictive stance”. Therefore, in order to accord with the adopted London Plan, this requirement should be removed.</p> <p>As currently drafted, Part B of Policy 24 states that new employment floorspace of over 1,000sqm (gross) will be required to provide affordable light industrial workspace. It is considered the current drafting of this policy is ambiguous in that it does not state what proportion of employment floorspace will be required to be affordable. In addition, it is not clear where the 1,000sqm threshold has been decided and whether this is viable. The application of the 1,000sqm threshold should be tested and increased where identified to be unviable or unachievable. In addition, flexibility should be incorporated to allow an off-site contribution where provision of affordable workspace on suitable sites is not feasible. As such, it is recommended Part B of the policy is amended as per below (additions <u>underlined</u>):</p> <p><i>“The Council will require the provision of <u>a minimum of 10% affordable light industrial workspace (Use Class E(g)(iii))</u> within all major developments, over 1,000sqm of employment floorspace proposed (gross), in accordance with Policy 25 Affordable, flexible and managed workspace. <u>In exceptional circumstances where on-site affordable workspace is not feasible, the Council will accept a financial contribution for off-site affordable workspace.</u>”</i></p> <p>Part C(1) of Policy 24 states that “<i>major new development proposals for industrial space should be directed to identified Locally Important Indusrial Land and Business Parks identified on the Policies Map</i>”. Supporting paragraph 19.41 states that the Employment Land & Premises Needs Assessment 2021 identifies a minimum net additional requirement for 60,000sqm or 15ha of industrial land for the period 2019-39 and that vacancy rates within the borough are 0.5%, well below the London average, which means the borough does not have existing capacity for future industrial demand.</p> <p>By directing new industrial floorspace only to identified LSIS locations the borough’s available land for industrial development is restricted and could prejudice delivery of land / floorspace to meet the identified significant industrial need. London Plan Policies E4 and E7 support additional industrial capacity and intensification of business uses across all three categories of industrial land – SIL, LSIS and non-designated. It is therefore considered that the Council should also support the development of non-designated employment sites and other suitable potential employment sites for employment generating uses to ensure the identified future industrial land targets are met. As such, it is recommended Part C(1) of the policy is amended as per below (additional <u>underlined</u>):</p> <p><i>“Major new development proposals for industrial space should be directed towards Locally Important Industrial Land and Business Parks as identified on the Policies Map, <u>other non-designated employment sites and other suitable sites in alternative use (assessed on a case by case basis).</u>”</i></p> <p>[See comment in relation to Policy 25]</p>
Alexandra Bamford, Boyer Planning on behalf of Twickenham Film Studios	Policy 24. Industrial land	<p>Policy 24 – Industrial Land</p> <p>The policy aims to retain all industrial space across the Borough and seeks to support new industrial space where it meets the specified criteria.</p> <p>Part A) states that there is “<i>There is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused. Any redevelopment proposals are required to contribute to a net increase in industrial floorspace. Any refurbishment of existing industrial floorspace should include traditional formats along with workspace for light industrial, through intensification as set out in London Plan Policy E7 part A</i>”.</p> <p>Part B) requires the provision of affordable light industrial workspace within all major developments, over 1,000sqm of employment floorspace proposed (gross), in accordance with Policy 25 Affordable, flexible and managed workspace. 3.12 Part C) of the policy states that the Council will support proposals for new industrial space by the following means:</p> <p>1) Major new development proposals for industrial space should be directed towards the identified Locally Important Industrial Land and Business Parks as identified on the Policies Map;</p> <p>2) It can be demonstrated that new proposals would not adversely impact on the continued operation of other established employment uses within that site or on neighboring sites;</p> <p>3) New industrial space is flexible and adaptable for different types of activities and suitable to meet the requirements of local businesses; and</p>

		<p>4) Extensions to existing employment uses are of an appropriate scale in keeping with the surrounding area, role and function.</p> <p>We are in support of all parts of the draft policy as the retention of industrial land is so crucial to the local and national economy.</p> <p>The policy designates ‘Twickenham Film Studios, St Margaret’s’ as a ‘Local Significant Industrial Site’ in supporting paragraph 19.40. LSIS’s are “<i>recognised for their importance locally in providing job opportunities and meeting local business needs. In the borough these are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities</i>”.</p> <p>Importantly, supporting paragraph 19.42 highlights the recent loss in industrial stock within the Borough – “the Valuation Office Agency (VOA) recording a total stock of 163,000 sqm in 2015 falling to 156,000 in 2020”. This dramatic loss in industrial land has caused the Borough to become increasingly reliant on industrial and logistics space outside the Borough to service its population, which has wide ranging negative impacts on society, environment and economy.</p> <p>Recognising the emphasis that the policy places on retaining and supporting proposals for new industrial space, we recommend that the Council designates ‘Arlington Works, Arlington Works, Arlington Road, Twickenham, TW1 2BB’ within its Policy Map as a ‘Local Significant Industrial Site’.</p> <p>As outlined within Section 2 [See comment in relation to the place-based strategy], the Inspector did not permit the change of use to mixed-use namely Residential (C3) and Commercial (then B Class, now E Class), and highlighted the importance of retaining Arlington Works in industrial use. It therefore seems fundamentally important to designate Arlington Works in the Policy Map as a LSIS to ensure that its remains in industrial use.</p> <p>Designating Arlington Works as an LSIS would not only comply with the draft policy’s aim to provide new industrial space across the Borough, it would potentially allow for the Studios to expand into the only site available.</p> <p>4. SUMMARY AND CONCLUSION</p> <p>We trust that our above comments are of assistance and that the Council will give due consideration to the changes that we have recommended, specifically to the proposed designation of the Arlington Works site as a ‘Locally Significant Industrial Site’ in their emerging Policy Map.</p> <p>The Studios’ remains keen to engage with the Council in respect of the emerging Local Plan as well as in connection with the permitted and proposed development and enhancement of the existing facilities at the Site and we would welcome the opportunity to meet with officers to discuss this Site’s expansion into the neighbouring site in more detail across the next phase of the preparation of the emerging Local Plan.</p>
Tim Catchpole, Mortlake with East Sheen Society	Policy 24. Industrial land	We note the presumption against the loss of industrial land and the paucity of industrial land in the MESS area. It is interesting to note the reference to the Big Yellow storage unit on the Lower Richmond Road, yet no mention of the potential loss of the Stag Brewery site.
James Sheppard, CBRE, on behalf of LGC Ltd	Policy 24. Industrial land – LGC site	<p>4. Employment</p> <p>The draft Local Plan proposes to allocate the LGC site as ‘Locally Important Industrial Land and Business Park’ and we have assumed a ‘Key Business Area’ (noting LGC is not stated by name under paragraph 19.30). LGC understands the broad rationale of protecting these employment sites to ensure a sufficient employment land supply across the borough over the plan period, as evidenced in paragraph 4.15 of the draft Local Plan.</p> <p>However, we deem it crucial for the Council to further consider how these needs can be accommodated through mixed-use development. The indicative scheme presented to the Council, illustrates how a highly inefficient, sustainably located brownfield site can be redeveloped to increase job numbers from approximately 250 to a possible 850. This would constitute a substantial windfall of employment generation for LBRuT, whilst simultaneously achieving other policy aspirations such as affordable housing delivery. A mixed-use development would also achieve a wide range of placemaking objectives.</p> <p>The Council’s support of LGC, as is offered through the draft Local Plan, would culminate in the retention of LGC in the borough, thereby supporting its approximate 250 employees, some 50 per cent of which reside locally within LBRuT. Importantly, draft Policy 21 states that “the Council will seek to retain and attract investment from existing and emerging sectors to support the existing business base and create a diverse and enterprising local economy”. Draft Policy 22(A) goes on to state that “proposals for employment floorspace should support suitable workspace for the borough’s locally significant and diverse sectors, including those of particular importance to the borough’s local economy, namely (4) ‘scientific research and laboratory space’, and (2) ‘space to accommodate small and micro firms, for start-up, incubation and accelerator’.</p> <p>These sectors would be actively supported through a redevelopment of LGC’s site, through the development of modern, fit-for-purpose office and laboratory space and a third-party building accommodating mixed scale and sectoral employment uses, including affordable workspace.</p> <p>Indeed, a well-considered mixed-use proposal would align with a number of key employment policies. Draft Policies 21 and 23 seeks to protect existing floorspace for office and industrial use, with a no net loss approach. It has been demonstrated through illustrative masterplans for the site, presented to the Council, that this can be achieved through a more efficient and effective use of land. Draft Policy 21 goes on to promote the supply of affordable workspace to support small and medium sized enterprises, as identified in draft Policy 25, which would also be integrated into any mixed-use redevelopment scheme for the site.</p> <p>Draft Policy 24 however allows for little flexibility, constraining the Council’s ability to consider high-quality mixed-use schemes that deliver increases, both qualitatively and quantitatively, to employment floorspace, along with other planning and public benefit. The wording of draft Policy 24(A) states a “presumption against loss of industrial land”, continuing, “proposals which result in a net loss of industrial land will be refused”. We urge the Council to promote more flexible wording through draft Policy 24, that ensures no net loss of industrial floorspace and promotes net increases where feasible. This flexibility could be allowed for through deletion of “Proposals which result in a net loss of industrial land will be refused”. It can be demonstrated through intensification, and a more efficient and effective use of land, that mixed-use developments can come forward in appropriate locations that lead to net increases in industrial floorspace, whilst meeting other policy aspirations.</p> <p>We refer to adopted Policy LP40 (1) of the adopted Local Plan which, although seeking the broad protection of employment land, stating “land in employment use should be retained in employment use for business, industrial or storage purposes”, an allowance is made under exceptional circumstances for mixed-use redevelopment. Policy LP40 (4) states “mixed use development proposals which come forward for specific employment sites should retain, and where possible enhance, the level of existing employment floorspace”. Policy wording for the draft plan should carry with it a degree of flexibility in exceptional circumstances.</p> <p>Crucially, the potential for a co-location of uses on locally important industrial sites is allowed for under London Plan Policy E7. London Plan Policy E7(B) states that “Development Plans should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified”. Policy E7(B) goes on to state, “Intensification can also be used to facilitate the consolidation of an identified LSIS to support the delivery of residential and other uses”. The policy states that this approach should only be considered as part of a plan-led process of LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated master planning process in collaboration with the GLA and relevant borough. In LSIS the scope for co-locating industrial uses with residential may be considered”.</p> <p>LGC considers that any plan-led co-location of uses can be achieved whilst ensuring that those criteria set out in Policy E7(D) can be met.</p>
Nina Miles, GLA on behalf of Mayor of London	Policy 24. Industrial Land	We acknowledge that the Employment Land and Needs Assessment 2021 identifies a need to accommodate growth of 60,000sqm/15ha (100 industrial jobs) per annum but recognises few options to address this deficit. The approach to protecting existing industrial land in Policy 24 will help to protect existing floorspace and potentially provide a net increase through redevelopment and intensification as supported by Policy E7 LP2021.

Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Greggs Bakery: Introduction and background of the Background of the Site Promotion for Residential –	<p>These representations relate to the Greggs Bakery, Gould Road, Twickenham, referred to as ‘the Site’. Our client has an interest in the Site which is owned by Greggs PLC (hereafter ‘Greggs’).</p> <p><u>Introduction</u></p> <p>The existing Site comprises the former Greggs Bakery Site in Twickenham, within the London Borough of Richmond Upon Thames. The Site is L-shaped and is bound by the River Crane to the north and railway line beyond, residential properties on Norcutt Road to the east, Edwin Road to the south, residential properties on Crane Road to the west and further residential properties on Crane Road/ Gould Road and at Crane Mews to the north-west.</p> <p>There are a range of buildings covering the Site which comprises an area of 1.1ha. The majority of the Site is covered by a single storey industrial shed, which extends close to the full width of the site, alongside large extract equipment. There are also a number of associated two and three storey commercial buildings across the remainder of the Site which have developed in a piecemeal way over time. The existing buildings have reached the end of their life cycle and are unsuitable for alternative industrial uses, and the site is now fully vacant. The site is subsequently deemed surplus to Greggs’ requirements and Greggs have moved their operations to a more suitable Site due to the long-standing highways, access and amenity issues associated with this location.</p> <p><u>Background of the Site Promotion for Residential</u></p> <p>The Site is currently allocated within the ‘Locally Important Industrial Land and Business Park –West Twickenham Cluster (including Greggs Bakery and surroundings), Twickenham’ under the adopted Local Plan. The Site also falls within the ‘Key Office Area – West Twickenham Cluster’ under the adopted planning policy position.</p> <p>The Site has been promoted for residential-led redevelopment and it has been demonstrated that the Site is inappropriate for continued industrial use, over a number of years as part of the consultation process to both the adopted Local Plan (July 2018) and the emerging Local Plan. A summary of the previous representations are included below for background. The constraints of the Site remain unchanged, and unresolvable and we continue to maintain that the employment designation is inappropriate for the Site.</p> <p>Prior to the adoption of the current Local Plan in July 2018, the LBRuT published the Local Plan ‘Site Allocations Plan’ for consultation. Within this, draft Policy TW 11 (West Twickenham cluster, Twickenham) identified the Site for “<i>Mixed residential, start-up and small-scale hybrid business space and/or primary school. Proposed Designation as key employment site.</i>” This document was not taken forward and was superseded by the adopted Local Plan (July 2018), however this represents the borough’s initial approach to the Site’s redevelopment which considered a mixed-use scheme to be more appropriate in this location and where employment is retained, for this to be of small-scale business space rather than larger scale industrial.</p> <p>Representations were made by the Site owner to the currently adopted Local Plan (July 2018). It was thoroughly demonstrated that the Site is inappropriate for continued employment use and this position was supported by the Council’s own evidence base assessment (Employment Sites & Premises Study, 2017 prepared by Peter Brett Associates). The report identifies the ‘West Twickenham Cluster (including Greggs Bakery and surroundings)’ as a designated site that is “<i>less attractive to occupiers</i>” and identifies it as being “<i>constrained by poor access, particularly for HGV’s, and by its residential surrounds</i>”. Paragraph 3.10 of the Study states that the West Twickenham Cluster is “<i>located within residential areas like many of Richmond’s industrial sites, but they also have particularly poor access arrangements that significantly constrains their potential for redevelopment for alternative forms of industrial use.</i>”</p> <p>Despite the locational disadvantages identified within the LBRuT Employment Sites and Premises Study (2017), which formed part of the Council’s evidence base, the Site was allocated (as part of the 2018 adopted plan) within the ‘West Twickenham Cluster (including Gregg’s Bakery and surroundings)’ which seeks to protect the use of the land for employment. This policy is also contrary to the fact that the existing site is vacant and all former bakery operations have been re-provided elsewhere. The re-use of the existing buildings on site for employment use is also not viable or feasible as they are in a poor condition and require modernisation to meet modern business standards.</p> <p>Representations were submitted in relation to the Local Plan Direction of Travel Consultation and Call for Sites in March 2020 which demonstrated why the Site continues to be inappropriate for industrial use. Documents supporting the lack of suitability for industrial use were supplied to the Council as part of this submission and that evidence and supporting information can be re-provided to officers dealing with the draft Local Plan as necessary.</p> <p>Most recently, the Site was the subject of a planning application (ref. 19/0646/FUL) for residential-led redevelopment. The application was refused on 7th August 2020 on the basis of the loss of industrial floorspace and the lack of a S106 Agreement to secure review mechanisms for affordable housing. This application further outlined and evidenced why the Site was constrained and appropriate for residential-led development through the submission of site-specific documents and Transport Assessments, however these have not been considered in the draft policy position. Such documents can be re-provided to the officers dealing with the local plan if required or considered necessary.</p> <p>It is the applicant and their team’s firm position that the Site is inappropriate for industrial use and the Site has been consistently promoted for residential led development by both the applicant and the land owner. Positive consultation feedback during the planning application process from neighbours and local ward councillors also indicated that residential use would be their preferred use of the site due to its reduced impact on neighbouring amenity and character by way of potential noise, pollution, appearance and traffic.</p> <p><u>Comments on the 'Pre-publication' Draft Local Plan</u></p> <p>These comments principally relate to (1) the site’s proposed designation for industrial use, which we consider to be contrary to Council’s strategic objectives and reflect a failure to recognise the site’s unsuitability for employment, and (2) the inconsistencies between the LBR’s Draft Local Plan (as worded) and the London Plan (2021) meaning that these draft policies fail to meet the tests for soundness set out in the NPPF.</p>
Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 24 - Retention of industrial space	<p>As set out above [See comment in relation to the background on the site], the Site was put forward under the Call for Sites in March 2020 as an appropriate Site for residential-led development. The Council’s ‘Schedule of sites not taken forward as Site Allocations in the new Draft Richmond Local Plan’ sets out that the Greggs Bakery site was identified by both the respondent, along with other residents. However, it is the Council’s position that “<i>the loss of industrial floorspace would have a detrimental effect on the ability to meet future needs for employment land.</i>” The Draft Local Plan therefore sets out that the West Twickenham Cluster (including Gregg’s Bakery and surroundings) continues to be allocated as a Locally Important Industrial Land and Business Park. We object to the inclusion of this Site as a designated Locally Important Industrial Land and Business Park and note that part of the Cluster has already been permitted for residential use Lockcorp House (LPA planning application ref: 19/2789/FUL). We assert that the Greggs site is unsuitable for large scale employment use and that future needs for employment land in the borough can be met through other sites or even the mixed use redevelopment of the site (i.e. co-location).</p> <p>The Employment Land and Premises Needs Assessment (ELPNA)(December 2021) prepared by Stantec which forms the Local Plan evidence base, indicates that there is positive industrial demand but a lack of space for logistics firms. A continued strong employment land protection policy is therefore recommended on this basis and draft Policy 24 sets out a presumption against the loss of industrial land in all parts of the borough. We maintain that only appropriate sites should be protected and, where it is demonstrated that continued employment floorspace is not appropriate, and that there is no reasonable prospect of a site coming forward for the use allocated in a plan, it should be released and reallocated for a more deliverable use that helps to address another identified need in the borough in accordance with paragraph 122 of the NPPF. The policy should therefore make allowance for Sites that meet these tests. The ELPNA also identifies other potential sources of employment land which are not acknowledged in the draft Local Plan – these include the release of the Council’s own assets and the use of retail units that can be repurposed as flexible workspaces. As such, it cannot be demonstrated that any under-provision of employment floorspace on the Greggs site will affect the borough’s capacity to address future employment needs.</p> <p>The Policy does not appear to be supported by an updated Sites and Premises Study which assesses individual Site Constraints and site suitability for the priority employment sectors identified in the ELPNA. This draft policy therefore fails to meet the tests of soundness in the NPPF – being inadequately prepared and inconsistent with national and regional policy which seek a more balanced and considered approach to the redevelopment of former and vacant industrial sites. The evidence base in particular comprises just the Employment Land and Premises Needs Assessment, and therefore the protection of the Greggs Site is based upon a need for industrial floorspace, rather than a consideration of the specific site issues. Nevertheless, the conditions of the Site have not changed since the London Borough of Richmond Employment Sites and Premises Study (2017) was published. This identifies in relation to the Greggs Site that “<i>The site is bounded by residential uses. Crane Road is primarily residential road which means that operating hours, types of industrial activity and access are constrained. The current use experiences issues</i></p>

		<p><i>with HGV access</i>". The Site is identified as having poor compatibility with surrounding neighbours and poor access via residential roads with resident’s parking on both sides. It further sets out that <i>“The departure of Greggs presents an opportunity to redevelop a large site. However, the layout and location of the site has a number of constraints including access, hours of operation and the types of industrial activity permitted limiting the amount of employment floorspace that could be delivered. Redevelopment of the site would realistically be through a mixed use scheme. The northern part of the site, fronting the River Crane, is the most suitable area for employment use.”</i></p> <p>As identified by LBRuT, the use of the Site by Greggs as a bakery generated a significant level of daily HGV movement on the local highway. The streets surrounding the Site are narrow residential streets, intended to be used for residents to park their carsand are often heavily parked on both sides. The presence of HGVs on the residential street resulted in severe highways impacts including damage to parked cars. There is also evidence of damage to footways and kerbs where HGVs have had to mount the pavement. This also presents a safety risk for other road users and pedestrians. Local complaints of noise and poor air quality as a result of the presence of HGVs accessing the Site have also been reported. Greggs Bakery benefits from an unrestricted consent, meaning deliveries and servicing to and from the Site took place throughout the day including early in the morning and late in the evening and could continue to operate in this manner if occupied again by a business falling within the same use class. Twenty four access to the site (and the ability to operate at all hours) will also be required for a future employment use. As demonstrated by the Site’s planning history, there were a number of attempts to ameliorate the noise impacts of the bakery operation on the neighbours over the years. Despite the careful management of the bakery by Greggs and the acoustic measures implemented, the continued industrial use had a negative impact on neighbouring amenity and contributed to Greggs’ decision to relocate to a purpose-built facility in a more accessible and appropriate location (i.e. one not within a residential area). The existing industrial buildings are also incongruous in a residential setting and by occupying the full width of the site (which is necessary to maximise yard space and access), these buildings provide poor outlook to adjoining residential dwellings along Crane Road and Norcutt Road. These concerns would be addressed by a residential-led scheme which would incorporate gardens and increased separation distances compared to existing. Policy 24 sets out that proposals resulting in a ‘net loss’ of industrial land will be refused and that development proposals are required to contribute to a ‘net increase’ in industrial floorspace. The inclusion of the wording ‘shall be refused’ is not reflective of the balanced approach advocated within the NPPF and specifically within paragraphs 8 and 122 regarding employment provision. It is our opinion that the Policy fails to take into account whether an existing employment use on the site is appropriate, fit for purpose and of sufficient quality. The blanket policy simply focuses on quantum of floorspace and thereby could lead to scenarios where employment land is retained which remains inappropriate, unlet and discourages redevelopment. As set out above, the no ‘net loss’ approach is also not consistent with the London Plan and neglects considerations relating to the intensification or quality of industrial floorspace in a future scenario – the latter which would be significantly worse if a no “net loss” of floorspace was pursued on the Greggs site due to the aforementioned site constraints and the site footprint. The ‘no net loss’ approach has previously been tested by the Council as part of the 2018 Local Plan, where it’s inclusion was removed during the Examination process. The Examining Inspector to that Plan found the ‘no net loss’ approach to be unsound and in need of modification to “ensure flexibility and soundness” (Paragraph 100 of Inspectors Report). The reason the Inspector requested the additional flexibility within the 2018 Local Plan, but due to the principle that flexibility is required for soundness, notwithstanding the need to abate a loss of employment land. This principle still applies to the preparation of the current draft Local Plan.</p> <p>Opportunities for a change of use on site which does not adhere to the aforementioned policy are contained within the subtext to Policy 24. These opportunities are significantly constrained and absolute, meaning exceptions to the policy and discretion by the Council to unique site circumstances would be extremely limited. Furthermore, any exception or qualification to the policy should be made clear within policy text and should not sit within supporting narrative. On that basis, we recommend that the following text on exceptions is incorporated into draft Policy 24:</p> <p>‘The loss of industrial land will be supported where:</p> <ul style="list-style-type: none">• There is no reasonable prospect of the site being used for industrial and related purposes;• The continued use of the site for industrial purposes would fail to comply with Local Plan policy requirements specifically relating to;▪ Access▪ Service and delivery arrangements▪ Vibration and noise impacts▪ Air quality, including dust, odour and emissions and potential contamination▪ Safety and security▪ Agent of change principles’ <p>London Plan Policies E4, E6 and E7 also make clear that the scope for co-locating industrial uses with residential and other uses may be considered on LSIS. The draft Local Plan Policy does not allow for the provision of this and is therefore inconsistent with the London Plan. The draft policy should therefore be updated on this basis.</p> <p>Paragraph 7.10 of the Employment Land and Premises Needs Assessment identifies Greggs as a site for redevelopment for employment uses and suggests that the current floorspace could be re-accommodated and net additional floorspace secured as far as practical. However, the report then goes on to acknowledge in relation to the Greggs site that <i>“the density may be limited due to nearby residential properties, and also that access will limit the number and possibly the type of vehicles that can access the site.”</i> It is also further acknowledged at paragraph 5.24 that <i>“the intensification potential for the site is limited as it is already intensively developed.”</i> The policy suggestion that the current floorspace could be re-accommodated and net additional floorspace secured is therefore unfounded and contrary to the evidence base.</p> <p>The current Site comprises a large industrial shed which fills the majority of the Site in close proximity to the neighbouring residential dwellings. There is currently inadequate parking or turning circles for large vehicles. Therefore, the Site cannot accommodate intensification and given the site constraints, the quantum of floorspace that could be delivered as part of any employment redevelopment would be severely reduced. Furthermore, advice from agents confirms that modern commercial accommodation needs to accommodate car parking, double height workspace for fork-lift access and turning circles for 7-tonne plus lorries. The Greggs Site cannot accommodate this grade of floorspace. As such, the assumption in the evidence base that the Site could deliver 7,082 sqm of employment floorspace is wholly inaccurate. The reliance that the Employment Land and Premises Needs Assessment places on the Greggs site for a significant level of industrial floorspace is therefore disputed.</p> <p>The report also identifies that without the Greggs site, the borough has a 7-month supply of industrial floorspace, which increases to 5-years and 2-months when the Greggs site is included. This is based on available floorspace, however in reality, the loss of Greggs Site results in the loss of a single industrial unit, which has been vacant for a number of years. Importantly, the actual ‘Total Stock’ remains the same since the Greggs site is vacant and all former jobs have been re-provided elsewhere. The site has also been marketed since 2018 and retaining the site for industrial floorspace would simply result in retention of aa vacant and inoperable site, rather than provide a high quality industrial offering within the borough.</p> <p>In conclusion, it has been clearly demonstrated through Secretary of State Direction to the London Plan (2021) and Inspector comments to the LB Richmond Local Plan 2018 that a ‘no net loss’ approach fails to meet the test of soundness within the NPPF. This coupled with the absence of site specific evidence to the suitability of the allocated sites allows us to conclude that Policy 24 in its current form would be unsound and should be amended to provide additional flexibility, take account of need and employment quality and acknowledge site specific circumstances.</p>
Henry Carling, Kandahar (Jackson Square) Ltd	Chapter 19, Paragraph 19.40 (in relation to Marlborough Trading Estate, Mortlake Road, Kew)	This paragraph states that the site known as Marlborough Trading Estate, Mortlake Road, Kew has been designated by the Council as 'Locally Important Industrial Land and Business Parks.' This designation does not accurately reflect the established lawful use of the site. Application Ref. No. 18/1233/ES191 for a Certificate of Lawful (Existing) Use, which was determined on 20 June 2018, confirmed that the established uses within the site were for B1 (office) and B8 (warehouse). In other words, the site contains a mix of employment uses. As such the designation of the site as a 'Locally Important Industrial Land and Business Park' does not reflect its lawful use. Rather it is a 'mixed use' employment site. It therefore does not conform with either this or the 'Key Business Areas' designation.

		<p>We are also mindful of the conclusions drawn in the latest evidence as provided by the London Borough of Richmond upon Thames 'Employment Land and Premises Needs Assessment' December 2021 (paragraph 7.13) state that, with regard to 'other protected industrial sites':</p> <p>'The remaining reservoir of sites is generally too small to warrant specific policies or allocations - all being below 1 ha and many below 0.5 ha.'</p> <p>The site is some 0.6 ha in size. We would therefore request that the designation of Marlborough Trading Estate, Mortlake Road, Kew as a 'Locally Important Industrial Land and Business Park' is deleted. As protection of employment floorspace in already provided for through Policy 21 such an approach would not undermine the Council's overall objective of seeking to protect existing employment uses and would still be in general conformity with the London Plan 2021.</p> <p>The use of the name 'Marlborough Trading Estate' is historic and does not reflect its authorised existing use. It is therefore requested that '159 Mortlake Road' is used if there is any reference made to the site in any Council documentation.</p>
	Policy 25. Affordable, flexible and managed workspace	
Daniella Marrocco, ROK Planning on behalf of Shurgard UK Ltd	Policy 25. Affordable, flexible and managed workspace	<p>[See comment in relation to Policy 24]</p> <p>Policy 25 Affordable, Flexible and Managed Workspace</p> <p>Policy 25 Part B(4) states that provision of affordable workspace will be required within major developments with over 1,000sqm of proposed employment floorspace (gross). The wording of this policy differs slightly from Part B of Policy 24 in that Policy 25 requires “affordable workspace” only compared to “affordable light industrial workspace” in Policy 24; this should be clarified. In addition, it is considered the current drafting of this policy is ambiguous in that it does not state what proportion of employment floorspace will be required to be affordable and at what rate of affordability within the policy wording; whilst this is included within the supporting text, it is considered it should also be included within the policy wording to ensure clarity. It is also not clear whether the 1,000sqm threshold is viable. The Employment Land Review (2021) states the existing affordable workspace policy retains the 1,000sqm trigger and discusses the need to expand the policy from office only to any business use, as the delivery of office space is lacking; however the Review notes that it is not a specific workspace evidence base document and viability testing has not been undertaken. The application of the 1,000sqm should be tested and increased where identified to be unviable or unachievable. Flexibility should be incorporated to allow an off-site contribution where provision of affordable workspace on suitable sites is not feasible. As such, it is recommended Part B of the policy is amended as per below (additions <u>underlined</u>):</p> <p><i>“Requiring the provision of a minimum of 10% affordable light industrial workspace (Use Class E(g)(iii)) within all major developments with over 1,000sqm of employment floorspace proposed (gross). Affordable workspace will be required at 80% of local market rates for a minimum of 15 years, to be secured through planning obligations. In exceptional circumstances where on-site affordable workspace is not feasible, the Council will accept a financial contribution for off-site affordable workspace.”</i></p> <p>Conclusion</p> <p>Shurgard consider amendments are required to Policies 24 and 25 of the Richmond Pre-Publication Draft Local Plan to ensure clarity within the policy requirements and accordance with the London Plan. This, in turn, ensures the emerging Local Plan can be considered sound as identified in NPPF Paragraph 35.</p>
Henry Carling, Kandahar (Jackson Square) Ltd	Policy 25 (Affordable, flexible and managed workspace)	<p>It is noted that Part B (3) to the policy does not provide any threshold as to when securing the appointment of managed workspace providers will be required but rather only refers to 'new business space'. This would suggest that proposals for the provision of even a minor amount of new floorspace as an extension to an existing premises would be subject to this requirement. This would be unworkable in practice and could impact on the viability of a site or premises. The inclusion of a threshold should be provided and/or it should be made clear that this would not apply to extensions to existing premises.</p>
Tim Catchpole, Mortlake with East Sheen Society	Policy 25. Affordable, flexible and managed workspace	<p>We agree with the aims set out.</p>
Nina Miles, GLA on behalf of Mayor of London	Policy 25. Affordable, flexible and managed workspace	<p>We note that Richmond identifies creative industries as an area of specialisation for the borough’s economy which is characterised by a large proportion of micro-business units and that there is a limited availability of stock of affordable, flexible ‘studio workroom’ units and ground floor light industrial and larger industrial units. Policy 25 seeks to protect existing affordable workspace and requires the provision of new in accordance with Policy E3 LP2021. This is welcomed, although Richmond should ensure that this is supported by local evidence in accordance with E3 Part C and in the circumstances outlined in Part B.</p>
Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 25 - Affordable Workspace	<p>We appreciate the supportive stance toward smaller-scale businesses and accordingly the intended delivery of affordable workspace within the borough in accordance with London Plan Policy E3. London Plan Policy E3 states that ‘<i>Boroughs, in their Development Plans, should consider detailed affordable workspace policies in light of local evidence of need and viability.</i>’</p> <p>In its current format, Policy 25 does not provide adequate detail in terms of specific affordable workspace targets. A suggested minimum target for developments proposing over 1,000 sqm is contained within the supporting text only, and is not supported by a detailed evidence base. Furthermore, the policy provides no provisions to take into account site specific viability information. As per other London Boroughs, the affordable workspace policy should allow the Council to accept a level of affordable workspace that sits below policy requirements in exceptional circumstances and where it is robustly justified, including through viability information. On this basis, we disagree with the Council’s assertions that Policy 25 is in accordance with London Plan Policy E3 and ask that this policy is amended to provide clarity on any evidence-based target requirements and to incorporate opportunities to consider site specific circumstances and viability information.</p>
	Policy 26.Visitor economy	
Theresa Oddelm, The Royal Parks	Policy 26 Visitor Economy	<p>As important visitor attractions within the Borough, we would like to see Richmond and Bushy Parks specifically included within this policy in the context of The Royal Parks being supported in providing the necessary infrastructure to support visitor numbers.</p>
Tim Catchpole, Mortlake with East Sheen Society	Policy 26.Visitor economy	<p>There is some potential for expanding this within the MESS area. This is associated with the river, the Stag site, the Sheen Lane Community Centre, Richmond Park plus the local and passing trade demands for higher quality seating and al fresco areas particularly making use of Milestone Green and the extremely wide pavements along sections of the Upper Richmond Road West, for example adjacent to Connaught Avenue and Paynesfield Avenue. However, any such seating needs to be assessed in terms of exposure to traffic pollution.</p>
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 26	<p>RBGK welcome Policy 26 (Visitor economy), particularly part (1) of the policy which supports proposals that promote and enhance the borough's existing tourist attractions, including Kew Gardens as well as other historic and cultural assets that are connected via the River Thames. RBGK also note part (2) of the policy, which requires proposals that lead to increased visitors and tourists will be assessed against the transport policies of this Plan. RBGK highlight that the nature of the offer at Kew Gardens means that there are regular events throughout the year that lead to increased visitors at certain times. This is how the organisation has functioned over many years; and is an essential part of its visitor attraction remit. These events are of great public benefit. Provisions for temporary events of this nature could, therefore, be considered and legislated for in the plan (see comments under policy 32). [See other comment]</p>
Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	Policy 26.Visitor economy	<p>As drafted, Policy 26 does not reference Twickenham Stadium or its role in the visitor economy. We would request that the stadium is added to the existing attractions that the borough will support, promote and enhance. We suggest that Part A of this Policy (p.220) is updated as follows (amendments in red/strikethrough).</p> <p><i>A. The Council will support the sustainable growth of the visitor economy for the benefit of the local area by:</i></p> <p><i>1. supporting proposals which promote and enhance the borough's existing tourist attractions, including the unique, historic and cultural assets that are connected via the River Thames, such as The Royal Botanic Gardens, Kew, Ham House and Hampton Court Palace;</i></p> <p><i>2. proposals that lead to increased visitors and tourists need to be of an appropriate scale for the size of the centre and will be assessed against the transport policies of this Plan;</i></p>

		<p>3. requiring accommodation and facilities to be accessible to all; either 10% of hotel bedrooms should be wheelchair accessible or 15% of new bedrooms to be accessible rooms as set out in London Plan Policy E10;</p> <p>4. enhancing the environment in areas leading to, within and around visitor destinations where appropriate;</p> <p>5. supporting the Cultural Quarters in Richmond and Twickenham and other existing clusters of cultural facilities and creative industries, particularly in town centres, and where ancillary facilities are proposed that are open for public use (such as restaurants, gyms and conference facilities).</p> <p>6. supporting appropriate development at Twickenham Stadium which complements the use of the site as an internationally significant sports and entertainment venue.</p>
Katy Wiseman, National Trust	Policy 26. Visitor economy	<p>The National Trust are the owners and custodians of several assets within the Richmond Borough, including Ham House and Gardens, Petersham Meadows and East Sheen Common. We welcome the opportunity to comment on the draft Richmond Local Plan ‘The best for our borough’ at Regulation 18 and wish to make the following comments.</p> <p>Ham House and Gardens is set back from the River Thames in Richmond and includes a rare 17th Century mansion which is a grade I listed building and a range of outbuildings all set within a large garden. Ham House is a significant visitor attraction and local asset within the borough of Richmond, and we therefore support Policy 26 which seeks to support the sustainable growth of the visitor economy for the benefit of the local area. This policy aligns with paragraph 81 of the NPPF which requires planning policies to proactively encourage sustainable economic growth. We particularly support criterion A1. as it supports proposals which promote and enhance the borough’s existing tourist attractions, and we are pleased that the Council has recognised Ham House within the policy wording. We also support criterion A4. as it recognises the importance of approaches to and from visitor destinations and their setting to the overall visitor experience.</p>
Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	Policy 26. Visitor economy	<p>General support for the visitor economy is welcomed.</p> <p>Sections A & B both give generalised support for new proposals, eg additional visitor bedspaces, but then refer back to other Local Plan policies which seek to impose restrictions which might make many such proposals unacceptable. Whilst this is, of course, acknowledged to be necessary on matters of detail and individual site considerations it also seeks to impose wider locational criteria policies. For example, strict interpretation of the policy would potentially restrict the addition of bedspaces in an otherwise perfectly acceptable scheme at any existing location that happens to be outside of a town or district centre. The development or redevelopment of existing sites should be recognized as an important opportunity not to be precluded in principle by other policies in the Plan.</p> <p>Page 221, Para 19.62 - 67, in particular 19.64 should also recognize the point made above.</p> <p>Change considered necessary: ADD words to b[2] so that it reads as follows: "proposals which increase the number of bedspaces will be supported, including developemnt and redevelopment of existing visitor accommodation sites, subject to other LocalPlan policies"</p>
	Policy 27.Telecommunications and digital infrastructure (Strategic Policy)	
Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 27.Telecommunications and digital infrastructure (Strategic Policy)	We support the Council’s policy “to ensure that new telecommunications infrastructure is sited appropriately and that the number of sites used is minimised where possible.” We are opposed in principle to the siting of such infrastructure within the Crane corridor. Although the corridor may offer a lower financial-cost solution for the operator, such infrastructure will intrude visually and conceptually into its tranquillity.
Tim Catchpole, Mortlake with East Sheen Society	Policy 27.Telecommunications and digital infrastructure (Strategic Policy)	We note that the new wave of aerial masts is associated with 5G. We have had seven applications for aerial masts in our area in the past two years and none of them have been accompanied by adequate visual impact studies including photomontages. We would like to see this policy make a request that all applications should include such studies. We have been undertaking such studies ourselves in order to assess the impact, but it should be the role of the promoter, not the local community, to do this.
Louise Fluker, The Richmond Society	Policy 27.Telecommunications and digital infrastructure (Strategic Policy) and paragraphs 19.72 & 73	we support the Council’s position
Graeme Fraser-Watson, The Teddington Society (Planning Group)	Shopfronts (Section 20 Protecting what is special and improving our areas (heritage and culture)	We are pleased to see that the council will resist the removal of shopfronts of architectural or historic interest and that shopfronts including signage and illumination should complement the proportions, character, material and detailing, surrounding street-scene and the buildings of which they forms a part. We know, from experience, that many owners, leaseholders (existing and future ones) are not aware that this is the case, nor are they advised about this by the local estate agents. Is there some way that the local plan can ensure this can be properly and regularly communicated to the interested parties ?
Theresa Oddelm, The Royal Parks	Policy 28 Local Character and Design Quality	The scale and nature of Richmond and Bushy Parks is such that they are considered to be a significant influence on the local character. It is important that development does not threaten their character. As an important component of the Borough’s character, the inclusion of the Parks’ importance, and reference to their protection, should be included within this Policy.
Vicky Phillips, Habitats & Heritage	Policy 28. Local character and design quality (Strategic Policy)	paras 20.17 and 20.18 – we strongly support the need to ensure that lighting is appropriate and does not have a detrimental impact on biodiversity and protected species. This is an area where the Council needs to keep up with current research which is showing that some lighting previously considered non-detrimental is having a detrimental impact.
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 28. Local character and design quality and Policy 44. Design Process	We support the policy. The National Design Guide sets out ten characteristics of well-designed places, including movement, nature, safe and socially inclusive public spaces, mixed and integrated uses and healthy and sustainable homes and buildings, all of which contribute towards health and wellbeing. We suggest that the Council’s public health team in involved in the local design coding process. There are numerous national accreditations and standards which already seek to improve design, such as Building for a Healthy Life and BREEAM. NHS England published Healthy New Towns ‘Putting Health into Place’ in September 2019 which provides advice on designing healthy places. When setting out requirements relating to health and care facilities, there is a need to include a specific reference to DHSC’s Health Building Notes which provide guidance on the design and planning of new healthcare buildings and their immediate environment.
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Housing quality	[See comment on housing design, and health and wellbeing]
	Protecting what is special and improving our areas (heritage and culture)	
	Policy 28. Local character and design quality (Strategic Policy)	
Tim Catchpole, Mortlake with East Sheen Society	Policy 28. Local character and design quality (Strategic Policy)	We note the addition of nine new principles such as the promotion of energy efficiency, urban greening, etc. However, we also note that one phrase in LP1 seems to have disappeared, vis: “gated developments will not be permitted” – admittedly in brackets. We wonder why? Is it because this has been proved to be unrealistic?
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of	Policy 28. Local character and design quality (Strategic Policy)	The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the ‘character areas’ and ‘places’ identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework .

Richmond (and supported by the Friends of Richmond Green)		The wording needs to be further amended to define ‘the places’ identified in Arup’s Urban Design Study, and the purpose of such a designation.
Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 28. Local character and design quality (Strategic Policy)	The wording of Part A of the Policy needs to be amended to refer to the Borough’s conservation areas as well as to the ‘character areas’ and ‘places’ identified in the Borough-wide characterisation work undertaken as part of Arup’s Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework . The wording needs to be further amended to define ‘the places’ identified in Arup’s Urban Design Study, and the purpose of such a designation.
Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 28 Local Character and Design Quality	Recommended Amendments and Explanation Policy 28 supports the introduction of high-quality architecture and urban design. Whilst the drafting of the policy is generally supported, Part B of the policy is unsound. We recommend the following amendment to Part B to make the policy sound: ‘To ensure development respects, contributes to and (where appropriate) enhances the local environment and character, proposals must reflect and demonstrate the following principles’.
Unity Harvey	Page 228 Advertisements and hoardings, Paragraph 20.22	Please could you ensure that banners are still included in the list of banned advertisements especially on Metropolitan Open Land including on Sports Centres and Playing Fields. Individual coaches and clubs would like their own banners...
Jon Burrell	Policy 28 Local Character and Design Quality, Paragraph 20.23	Digital advertising displays are energy wasteful and serve minimal public utility. Policies should be developed that ensure energy utilisation is minimised e.g. displays are static and require no additional lighting or energy supply. Policies should not just be about the visual appearance. Changes considered necessary and supporting evidence: http://adblockbristol.org.uk/2019/11/the-electricity-cost-of-digital-adverts/ https://e360.yale.edu/digest/digital-billboards-consume-large-amounts-of-energy-analysis-shows https://movia.media/moving-billboard-blog/are-digital-billboards-bad-for-the-environment-1/
Matt Scales, Metropolitan Police Service - Designing Out Crime	Policy 28. Local character and design quality, B11 and B12	<p>Thank you for providing the Metropolitan Police Service (MPS) with the opportunity to comment on the Richmond Draft Local Plan. This response is following on from a consultee letter sent to us on the 12th April 2022. This response is solely referencing Crime Prevention and Designing out Crime, through our delivery of the National Police Service Secured by Design scheme. You may receive responses from other areas of our organisation, where the draft plan interacts with that particular area of business.</p> <p>We have some specific observations on sections of the draft plan and also some further observations in relation to the Secured by Design scheme. We hope you find our comments useful.</p> <p>However, if you have any issues or queries please don’t hesitate to contact us.</p> <p>The Secured by Design scheme has proven results in reducing crime and the fear of crime, with up to 87% reduction in Burglary and 25% reduction in criminal damage on new build projects, and 61% in major refurbishment projects (2009). The scheme is also successful at reducing anti-social behaviour, through a raft of measures including robust communal door standards, access control and careful design / layout of new homes.</p> <p>The Secured by Design scheme can deliver safe and sustainable homes and businesses through a range of techniques in crime prevention, including utilising independently tested products proven to resist attack and misuse.</p> <p>Policy 28 - Local Character and Design B11</p> <p>The MPS is supportive of reference B11 which states “Minimise opportunities for crime and antisocial behaviour, based on an understanding of the locality and site-specific circumstances, utilising principles of natural surveillance and orientation of buildings as well as uses.”</p> <p>We would like to encourage early consultation with Metropolitan Police Designing-Out Crime Officers (DOCO’s) to be considered as well as following the Secured by Design (SBD) Guides for New Homes/Schools/Commercial as applicable. To this end we would appreciate an additional point to be added into section B of Policy 28 which would read as written below:</p> <p>Policy 28 – Local Character and Design B12</p> <p><i>‘The Council will consult the Metropolitan Police on all applications involving major development, significant community interest or those deemed appropriate by the Local Planning Authority. In certain circumstances, achieving Secured by Design certification may be required as a condition of planning consent. Applicants should consult with the Metropolitan Police designing out crime officers at the earliest opportunity and include details of security and secured by design compliance on the Design and Access statement.’</i></p> <p>Additionally the MPS and the Secured by Design scheme can play a huge role in a safe environment, health and wellbeing. Research has consistently shown that crime, the fear of crime and health are related (<i>Crossman & Rader, 2011; McKee & Milner, 2000; Stiles et al., 2003; Whitley & Prince, 2005</i>).</p> <p>Due consideration should be paid to the Council’s duty under Section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in excising its planning functions; to promote the well-being of the area in pursuance of the Council’s powers under section 2 of the Local Government Act 2000 and to ensure the development provides a safe and secure environment in accordance with the London Plan 2021 in Section B of policy D11.</p> <p><i>We would further like to draw reference to the new London Plan;</i></p> <p>London Plan Policy D11: Safety, Security and Resilience to Emergency</p> <p>Paragraph 3.11.3</p> <p>Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police.... This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.</p> <p>Paragraph 3.11.4</p> <p>The Metropolitan Police (Designing-Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.</p> <p><i>I would finally like to reference one final section of the London Plan when considering our comments above.</i></p> <p>London Plan: Policy D11: Section B:</p> <p>Boroughs should work with their local Metropolitan Police Service ‘Design Out Crime’ officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.</p> <p>Thank you again for the opportunity to comment on this plan. The MPS Designing Out Crime Team strive to ensure that new developments across London reach the highest possible security standards, mainly through partnership working with the relevant Planning Departments and requesting conditions to comply with Secured by Design. By including a requirement in your core planning strategy that major new schemes will require Secured by Design accreditation, after proper consultation with Designing out Crime Officers, we are better placed to deliver secure developments across the London Borough of Richmond Upon Thames.</p>

	Policy 29. Designated heritage assets	
Theresa Oddelm, The Royal Parks	Policy 29 Designated Heritage Assets	We welcome the Council's approach to heritage assets, especially with regard to the protection and enhancement of the Borough's Historic Parks and Gardens.
Alice Shackleton, on behalf of The Kew Society	Policy 29 Designated Heritage Assets and Policy 30 Non designated Heritage Assets	With regard to section 8 of Policy 29 (Protect and enhance the borough's registered Historic Parks and Gardens) see our comment under 8 [in relation to the place-based strategies] above in relation to heritage assets. 29 - A & C and 20/29/2 and 30 A : we would remove the words "where possible" in the context of taking opportunities to improve and "where possible" to enhance: if it is not possible then the words are not needed but if the words are included would they not offer scope for developer to argue the case? It almost suggests this.
Katie Parsons, Historic England	Policy 29: Designated Heritage Assets	We recommend some amendments to wording of part A. 2. As written the policy equates substantial harm with the total loss, i.e. demolition, of an asset rather than dealing with significance. NPPF paragraph 200 states that <i>Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.</i> The NPPF is clear that substantial harm can occur without demolition or total loss of the asset. The policy as written implies that only demolition will be substantial harm which is not the case. Furthermore, when considering substantial harm, the term resist is a weaker test that is unlikely to be effective given that such harm should be either exceptional or wholly exceptional (depending on the grade of asset), and that NPPF 201 goes on to tell us that where a proposed development will lead to substantial harm or total loss of significance consent should be refused (stronger than resisted). Ideally local plans ought not to duplicate the tests set out in the NPPF, however if you do wish include a policy criterion along these lines, we advise that this policy is amended to better reflect the tests set out in the NPPF. If, however the intention of part A.2. is not to deal with substantial harm but to instead provide a policy provision to maximise embodied carbon through the retention rather than demolition of buildings, then this could be drawn out as a separate issue. A policy criterion covering just the importance of reusing and repurposing heritage assets would be a simpler more effective way of achieving this policy objective. In either situation this policy criterion should be amended and split into two to cover two differing issues 1) substantial harm, 2) demolition, reuse, and embodied carbon. At part F it would be helpful to reference the risks posed by maladaptation, for instance: <i>Sympathetic measures to make energy and carbon savings in historic and listed buildings are encouraged, by adopting a ‘whole house approach’ and understanding all the factors that affect energy use to avoid maladaptation. Any potential damages to the structure or heritage value, or impacting the setting of, historic buildings have to be avoided.</i>
Louise Fluker, The Richmond Society	Policy 29. Designated heritage assets and Policy 30. Non-designated heritage assets	nothing is said about issuing enforcement notices where owners have left listed buildings or buildings of townscape merit to decay!
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 29	Policy 29 (Designated heritage assets) is generally supported as it largely reflects policy contained within the NPPF. However, Part A(3) resists the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place. The change of use of a building is not generally controlled by the listed building consent process; rather it is a matter of whether the change constitutes development (or is 'permitted development'), under the Town and Country Planning Act. Further, the change of use of heritage assets can be a positive thing to help bring them back into a functioning, viable use that is consistent with their conservation; and in turn helps to secure investment in their upkeep to preserve them for years to come. The PPG also acknowledges that the 'optimum viable use' is not necessarily the original use. While harm to significance should always be generally avoided, changing the use of a historic asset is sometimes necessary to secure other heritage and public benefits and this might be better reflected in the policy. It is RBGK's intention to improve the energy efficiency and sustainability of some of its listed buildings in the forthcoming years and RBGK look forward to working with the Council to achieve this, but RBGK welcome the recognition in the draft plan that there is a balance to be achieved between securing energy and carbon savings in historic buildings whilst protecting their architectural and historic significance. RBGK also suggest that acknowledgement of this is provided within the main energy and sustainability policies (i.e. policies 3-7). Of note, Part F of Policy 29 recognises that, whilst energy and carbon savings in historic and listed buildings are supported, there are limitations given the heritage value of these buildings and the need to protect sensitive fabric. The supporting text of this policy acknowledges that each proposal will be assessed on a case-by-case basis. RBGK support this approach that attempts to deal with the complex but important balance between environmental / sustainability measures and harm to a heritage asset. RBGK would encourage a focus on accommodating building efficiencies, where other potentially intrusive options could cause greater harm to significance. We would also highlight that there looks to be a reference error in the supporting text at paragraph 20.27, which refers to the RBGK WHS policy as Policy 29, rather than Policy 32 of the plan.
Tim Catchpole, Mortlake with East Sheen Society	Policy 29. Designated heritage assets	We note that your Section B duplicates Section A.9. One of these has to be deleted.
Katy Wiseman, National Trust	Policy 29. Designated heritage assets	The Trust supports proposed Policy 29 Designated heritage assets which requires developments to conserve, and where possible, take opportunities to make positive contributions to, the historic environment of the borough. We support wording within this policy which requires developers to also have regard to the ‘setting’ of heritage assets when considering the significance of the borough’s designated heritage assets, whilst we support paragraph 20.29 within the draft Local Plan, we feel this could be strengthened by linking with proposed Policy 31. Views and vistas. Climate change is the single biggest threat to the precious landscapes and historic houses that we care for. Rising temperatures are damaging some of the finest painting in our care with pests and diseases posing greater risks to our collections, tree and plants. We’re tackling the causes of climate change by reducing emissions. We are adapting and changing the way we manage our assets and cutting our carbon emissions. We have an environmental pledge that by 2030 we’ll be carbon net-zero across our own emissions and those created by our supply chain and investments. We are pleased that the draft Local Plan recognises that historic and listed buildings will also need to adapt and that sympathetic measures to make energy and carbon savings in historic and listed buildings are encouraged (criterion F) as this will allow us to adapt our significant historic buildings. Changes considered necessary: Whilst we support paragraph 20.29 within the draft Local Plan, we feel this could be strengthened by linking with proposed Policy 31. Views and vistas.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 29. Designated heritage assets	No change proposed.
Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 29. Designated heritage assets	No change proposed.

<p>Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer</p>	<p>Policy 29 Designated Heritage Assets</p>	<div data-bbox="1670 193 2608 661"> <p>A. The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to <u>cause harm to a designated heritage asset would require clear and convincing justification and should be weighed against the public benefits of the proposal</u> adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced by the following means:</p> <ol style="list-style-type: none"> 1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset. 2. Resist the demolition in whole, or in part, of listed building. Consent for demolition of Grade II listed buildings will only be granted in exceptional circumstances and for Grade II* and Grade I listed buildings in wholly exceptional circumstances following a thorough assessment of the justification for the proposal and the significance of the asset. Careful and sensitive maintenance, management and reuse of heritage assets also saves embodied carbon and avoids the carbon dioxide of constructing new buildings. 3. Resist the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place. </div> <div data-bbox="985 636 1617 669"> <p>Recommended Amendments (tracked changes to Reg.18 draft text)</p> </div> <div data-bbox="985 669 1964 1829"> <div data-bbox="1041 669 1964 984"> <p>4. Require the retention and preservation of the original structure, layout, architectural features, materials as well as later features of interest within listed buildings, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset.</p> <p>5. Demolitions (in whole or in part), alterations, extensions and any other modifications to listed buildings should be based on proportionate<u>an accurate</u> understanding of the significance of the heritage asset.</p> <p>6. Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within listed buildings, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development.</p> <p>7. Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists.</p> </div> <div data-bbox="1041 984 1964 1232"> <p>8. <u>Proposals that affect the borough's Registered Parks and Gardens should conserve their significance. Where proposals may cause harm to that significance, that harm should require clear and convincing justification and be outweighed by public benefits.</u>Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.</p> <p>9. <u>Proposals that affect the borough's Scheduled Ancient Monuments should conserve their significance. Where proposals may cause harm to that significance, that harm should require clear and convincing justification and be outweighed by public benefits.</u>Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.</p> </div> <div data-bbox="1041 1232 1964 1829"> <p>B. Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.</p> <ol style="list-style-type: none"> 1. in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss; 2. in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or 3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area. <p>C. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.</p> <p>D. Where there is evidence of intentional damage or deliberate neglect to a designated heritage asset, its current condition will not be taken into account in the decision-making process.</p> <p>E. Outline planning applications will not be accepted in Conservation Areas.The Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans, will be used as a basis for assessing development proposals within, or where it would affect the setting of, Conservation Areas, together with other policy guidance, such as Village Planning Guidance SPDs.</p> <p>F. Sympathetic measures to make energy and carbon savings in historic and listed buildings are encouraged, by adopting a 'whole house approach' and understanding all the factors that affect energy use. Any potential damages to the structure or heritage value, or impacting the setting of, historic buildings have to be avoided.</p> </div> </div>
<p>Explanation/Justification</p>		


		<p>We consider the drafting of Policy 29 to be unsound. Paragraphs 201 & 202 of the NPPF (2021) state that where a proposed development will cause harm to a designated heritage asset (whether that be substantial or less-than-substantial), clear and convincing justification is required in order to demonstrate that such harm is outweighed by the public benefits of a development proposal. As currently drafted, Policy 28 is not compliant with national planning policy.</p> <p>3.5 Parts A.4, A.6 A.8 and A.9 are considered too specific, particularly in reference to the requirement to retain and preserve original structures, layouts and architectural features. There is no requirement to, in national planning policy or the London Plan 2021, to reinstate historic features, not least in cases of buildings of multiple periods, as it may not be appropriate to reinstate features of a particular phase of a building’s history.</p>
Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 30. Non-designated heritage assets	We are disappointed that this policy makes no explicit reference to the preservation and enhancement of the borough’s historic industrial sites and watercourses. These include for example the formerly industrial landscape of Crane Park with its water power, Little Park and the historic water features in the grounds of Kneller Hall. The whole of the Crane corridor is an area of archaeological importance, and it should be protected and promoted as a heritage and educational asset at least as rigorously as other assets identified in (20.37).
Louise Fluker, The Richmond Society	Policy 29. Designated heritage assets and Policy 30. Non-designated heritage assets	nothing is said about issuing enforcement notices where owners have left listed buildings or buildings of townscape merit to decay!
	Policy 30. Non-designated heritage assets	
Tim Catchpole, Mortlake with East Sheen Society	Policy 30. Non-designated heritage assets	<p>We note the inclusion of Buildings of Townscape Merit... and other local historic features. We are pleased that our historic walls dating from the 18th and 19th centuries have recently been designated as BTMs but there are numerous other walls not included and we hope that they will come to be recognised as ‘other historic features.’</p> <p>We also note that the applicants’ requirements have been removed from the policy statement and been transferred to the supporting text. This is logical.</p>
Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 30 Non-designated Heritage Assets	<div><div></div><div><p><u>The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm of loss and the significance of the heritage asset.</u></p><p>A. The Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, locally listed historic parks and gardens and other local historic features.</p><p>B. There will be a presumption against the demolition of Buildings of Townscape Merit.</p></div></div> <p>Recommended Amendments (tracked changes to Reg.18 draft text) Explanation/Justification 16.1 As currently drafted, Policy 30 is not consistent with national policy set out in NPPF (2021), which requires the effect of an application on the significance of a non-designated heritage asset to be taken into account in determining applications. There is no requirement in national legislation or policy to preserve or enhance the significance of non-designated heritage assets.</p>
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 30. Non-designated heritage assets	No change proposed.
Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 30. Non-designated heritage assets	No change proposed.
	Policy 31.Views and vistas	
Theresa Oddelm, The Royal Parks	Policy 31 Views and Vistas	We particularly welcome this policy as it aims to protect the quality of identified views, vistas, gaps and skyline, all of which are important factors in the Royal Parks. We also note that King Henry VIII's mound is included as a protected view which we commend. We would like to work further with the Council to positively manage views from the Parks in the context of new development.
Katie Parsons, Historic England	Policy 31: Views and Vistas	This is a helpful policy with appropriate criteria for assessing development proposals, we particularly support the criteria to seek improvements to remedy existing harm. However, we request the wording is amended to state “avoid harm to” rather than “protect” or “respect” the quality of views and setting etc. This wording is less ambiguous for applicants and decision makers.
Louise Fluker, The Richmond Society	Policy 31.Views and vistas	we support the Council’s approach but would point out that the biggest threats are from applications for high rise buildings outside the borough so a robust response by the Council to such applications is essential
Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 31.Views and vistas	We support the Council’s policy of protecting existing views and vistas and encourage the Council to “explore opportunities to create attractive new views and vistas” with particular reference to the River Crane corridor. Within the Crane corridor, we trust that the requirements of this policy will always take precedence over those of Policy 45 on tall and mid-rise buildings.
Tim Catchpole, Mortlake with East Sheen Society	Policy 31.Views and vistas	No comment but we look forward to consultation on the additional views being identified.
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 31	RBGK generally support Policy 31 (Views and vistas), which seeks to protect the quality of views and vistas. However, RBGK seek clarification as to how the views have been assessed - there is an evidence base, but it is not explicit as to how the views have been determined and allocated. In addition, RBGK is supportive of any proposal affecting a designated/identified view or vista having to submit computer-generated imagery and visual impact assessments as part of an application. This is particularly relevant for Kew Gardens, which is highly sensitive to the impacts of surrounding development. RBGK request that they are consulted as part of any future proposals that may affect the site. RBGK also wish to be kept informed of the forthcoming Views and Vistas SPD.
Katy Wiseman, National Trust	Policy 31. Views and vistas	The Trust supports proposed Policy 31 Views and vistas which seeks to protect the quality and identified views, vistas, gaps and the skyline which contribute significantly to the character, distinctiveness and quality of the borough. We support criterion A1. as it seeks to protect the quality of the views and vistas of designated/identified views and vistas, and we also support the requirement for proposals affecting designated views and vistas to be supported by computer-generated imagery as use of visualisation will help communicate to members of the public and other stakeholders the visual impacts of proposals. We wish to be kept informed and consulted on in the development of the future Views and Vistas SPD as having the opportunity to input into this supporting guidance will help us to protect our special places against adverse visual impacts.

Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 31 Views and Vistas	<p>Recommended Amendments (tracked changes to Reg.18 draft text)</p> <div> <p>A. The Council will protect the quality of the identified views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means:</p> <ol style="list-style-type: none"> 1. protect the quality of the views and vistas as identified on the Policies Map, and for any proposal affecting a designated/identified view/vista on the Policies Map demonstrate this through the submission of such through computer-generated imagery (CGI) and visual impact assessments as required by Policy 44 Design process; 2. require clear and convincing justification forresist development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline; 3. require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced, and reflect the relevant character area design guidance in the Urban Design Study; 4. require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background; 5. where appropriate, seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured; 6. preserve, or where appropriate, enhanceseek improvements to views within Conservation Areas, which: <ul style="list-style-type: none"> a. are identified in Conservation Area Statements and Studies and Village Plans; b. are within, into, and out of Conservation Areas; c. are affected by development on sites within the setting of, or adjacent to, Conservation Areas and listed buildings. </div> <p>Explanation/Justification We find Policy 31 unsound and too prescribed. Elements of the draft policy do not conform with the London Plan (2021), which states that development should not harm, and should seek to make a positive contribution to, the characteristics and compositions of Strategic Views and their landmark elements. We recommend the policy is redrafted in order to be brought in line with strategic planning policies of the London Plan (2021), specifically Policy HC4 – London View Management Framework.</p>
Nina Miles, GLA on behalf of Mayor of London	Policy 31. Views and vistas	We note that Richmond intends to identify its views and vistas on the Policies Map. Table 7.1 of the LP2021 identifies the King Henry VIII’s Mound to St Paul’s Cathedral linear view as a protected vista. The view should be managed by following the principles of Policy HC4 LP2021 and this should be noted in the supporting policy text. We welcome the recognition of the importance computer-generated imagery (CGI) and 3D modelling in Policy 31 and paragraph 20.44.
	Policy 32. Royal Botanic Gardens, Kew World Heritage Site	
Tim Catchpole, Mortlake with East Sheen Society	Policy 32. Royal Botanic Gardens, Kew World Heritage Site	No comment.
Katie Parsons, Historic England	Policy 32: Royal Botanic Gardens Kew	<p>In part A we request that the wording is amended to make reference to Outstanding Universal Value, e.g. <i>The Council will protect, conserve, promote and where appropriate enhance the Royal Botanic Gardens, Kew World Heritage Site, its Outstanding Universal Value and attributes, its buffer zone and its wider setting.</i></p> <p>The Operational Guidelines for the Implementation of the World Heritage Convention (2019) stress the importance of Heritage Impact Assessments, noting at paragraph 118 that these should be a pre-requisite for development projects and activities that are planned for implementation within or around a World Heritage property. We request that the policy includes an additional criterion requiring development within or around the WHS to provide an HIA upon application. ICOMOS has provided Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (2011) .</p> <p>It might also be helpful to explain how the Council will refer relevant applications to UNESCO within the justification text.</p>
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 32	<p>RBGK note that Policy 32 (Royal Botanic Gardens, Kew World Heritage Site) contains the same wording as adopted Local Plan Policy LP 6 (Royal Botanic Gardens, World Heritage Site). RBGK support the need for a site-specific policy, but request that the Council recognise that the effective management of the WHS requires an appropriate balance between the needs of conservation, access, interests of our visitors and the local community, and sustainable economic use and operation of the site. RBGK will need to develop and adapt the site into the future to support the sustainable function and operation of the Gardens, while continuing to provide a world-renowned, leading visitor attraction and working scientific and research institution. RBGK will ensure that any development proposal is sensitively designed to respect, conserve and enhance the site and its Outstanding Universal Value, but requests that the Council applies some degree of flexibility and scope in this regard. Therefore, RBGK request that a fourth point is added under Part A as follows: “Ensuring the long-term sustainability of the World Heritage Site will require a careful balancing between the needs of conservation, access, biodiversity, the climate emergency, income and the public benefits of any development on the site.”</p> <p>RBGK’s regular temporary exhibitions and installations are run throughout the year, for which planning permissions are often required. This is an appropriate and necessary part of the functioning of Kew as an internationally significant visitor attraction; and can be key in enhancing the visitor and learning experience for our local and international visitors alike. These exhibitions also provide a way to draw attention to important issues and key elements of Kew’s research, such as halting biodiversity loss. They draw visitors to the Borough, which provide other social and economic benefits. Given the related public benefits and frequency of the events and exhibitions, RBGK request that the following wording to be added as a fifth point under Part A: “Temporary events and exhibitions are recognised as a key part of the offer at the Royal Botanic Gardens, Kew World Heritage Site and, subject to other planning policy considerations within this plan, are supported in principle”.</p> <p>Regarding the third point of Policy 32, RBGK request that the relevant year is added for the Kew World Heritage Site Management Plan reference (2020-2025). RBGK also request that the reference to the "Kew Landscape Master Plan" is removed as this is dated and does not reflect Kew's latest thinking.</p>
Nina Miles, GLA on behalf of Mayor of London	Policy 32. Royal Botanic Gardens, Kew World Heritage Site	We welcome Policy 32 which recognises the Royal Botanical Gardens Kew as a World Heritage Site (WHS), in line with HC2 LP2021. A requirement for development proposals with the potential to affect the WHS or its setting to be supported by Heritage Impact Assessments should be within the Policy rather than supporting text.
	Policy 33. Archaeology	


Tim Catchpole, Mortlake with East Sheen Society	Policy 33. Archaeology	No comment but we insist there is sufficient time allowed for the necessary archaeological field investigations on the Brewery site.
	Increasing biodiversity and the quality of our green and blue spaces, and greening the borough	
Clare Snowdon	21 Increasing biodiversity and the quality of our green and blue spaces, and greening the borough	21 Biodiversity plan looks great. It would be really good to see inclusion of support for Nature-Connected Neighbourhoods, including urban hedgerows, swift tiles, hedgehog highways and wildlife gardening as well as equitable access to green and blue spaces. It would be great if the council could adopt the Wildbelt strategy as recommended by the Wildlife Trusts https://www.wildlifetrusts.org/sites/default/files/2020-09/Wildbelt%20briefing%20September%202020.pdf
Hilary Pereira, River Thames Society	General comments - blue/green spaces (e.g. page 241), Policy 47. Sustainable travel choices	<p>The River Thames Society (RTS) welcomes the opportunity to comment on this local plan. The Borough of Richmond is very important to the river, being the only London Borough with territory over both banks. Richmond’s Thames includes water that is fully tidal up to Richmond, half-tidal between Richmond and Teddington, and then non-tidal further upstream. As such, it helps demonstrate the diversity of the Thames which is celebrated by the RTS.</p> <p>Richmond is one of the most privileged parts of the country but that should not mean exclusive. The RTS shares the sentiment in the plan that Richmond needs to encourage wide enjoyment of the blue/green spaces it contains, and for which the Thames and its banks are so important. The RTS endorses the vision and strategic objectives in the plan in relation to protecting and improving the unique environment of the River Thames as wildlife corridors, as opportunities for recreation and river transport, increasing access to and alongside the rivers, gaining wider local community benefits and habitat improvements when sites are redeveloped. This means protecting river-related vistas and restraining any development which risks overpowering what makes the river environment so special</p> <p>The RTS is an active supporter of the Thames Landscape Strategy and is encouraged by Richmond Council’s commitment to continued partnership working (eg p241).</p>
Alice Roberts, CPRE London	General Comment (in relation to strategic approach to green space)	<p>CPRE London is a membership based charity with 2500 members across London, concerned with the preservation and enhancement of London’s vital green spaces, as well as the improvement of London’s environment for the health and wellbeing of all Londoners.</p> <p>We welcome the Council’s commitments to:</p> <ul style="list-style-type: none">• Protect and retain the borough’s Green Belt and Metropolitan Open Land and improve and enhance its openness, character and use.• Make no changes to the Green Belt boundaries.• Protect Local Green Space from inappropriate development that could cause harm to its qualities.• Designate six new sites as Local Green Space <p>However, we have the following concerns: [See comment in relation to the 20 minute neighbourhood concept and comment in relation to opportunities to meet need, and other comments].</p>
Heather Mathew, Richmond Council for Voluntary Service (CVS)	Page 18 (in relation to green and blue infrastructure)	Pg 18 The VCS play a crucial role in protecting, maintaining, enhancing and educating about the green and blue infrastructure, tackling climate change and engaging people of all ages- Habitats and Heritage, Friends of Barnes Common, Friends of Crane Park, River Thames Boat Project etc. The plan should acknowledge the breadth of expertise and community engagement that such groups provide and encourage developers to work with groups to “provide formal and informal education to enable people to learn about and connect with nature and biodiversity “(Pg 19)
Jon Rowles	Policy 21 (in relation to wildlife sites)	<p>Does not go far enough to secure a meaningful network of interlinked wildlife sites for wildlife to be able to move about and ensure genetic diversity. Hasn’t fully implemented the recommendations found in 'Making Space for Nature' by Sir John Newton.</p> <p>About twenty years all the railway lineside were recognised as important wildlife routes and then the following local plan deleted them all. Whilst I support the Whitton Linesides being added, I feel the whole route to Richmond Bridge should be added.</p>
George Goodby, Environment Agency	Sustainability Appraisal and Sequential Test Report	[See comment on the Sustainability Appraisal in relation to climate change, flood risk, green and blue infrastructure]
	Policy 34. Green and Blue Infrastructure (Strategic Policy)	
Tim Catchpole, Mortlake with East Sheen Society	Policy 34. Green and Blue Infrastructure (Strategic Policy)	We note this policy excludes the public open space hierarchy listed in LP12 and we wonder why?
Unity Harvey	Public Wellbeing - Dogs	<p>Dog owners often allow their dogs in Queen Elizabeth Walk to run off the lead on to the Enable Sports Centre. They are a constant nuisance.</p> <p>Please can you ensure that the following policies are retained: -</p> <p>a. No Dogs permitted on the Wandsworth Sports Centre and Richmond Playing Field,</p> <p>b. <i>Dogs must be kept on a lead on public roads, pavements and footpaths.</i></p>
Theresa Oddelm, The Royal Parks	Policy 34 Green and Blue Infrastructure	The Royal Parks form a large part of the green and blue infrastructure network within the Borough. We welcome the acknowledgement of recreational pressures and the impact of increased development on the Royal Parks within Richmond and therefore reference to working with The Royal Parks to ensure that careful management is achieved.
Theresa Oddelm, The Royal Parks	Policy 34 Green and Blue Infrastructure– comments specific to biodiversity and the Royal Parks’ Environmental Designations	Recognition of the role of green infrastructure in reducing recreational impacts on sites such as Richmond Park is welcomed. This is included in the background text, but specific reference should also be made within the policy text given the significance of this impact on sites, including the Bushy Park SSSI and Richmond Park SAC, SSSI and NNR.
Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 34. Green and Blue Infrastructure (Strategic Policy)	<p>We support the primacy which the Plan places on protecting and enhancing the borough’s Green Belt, Metropolitan Open Land and other open and designated spaces; and the “presumption against the loss of, or building on, greenfield sites.” (21.3) We support the recognition in the Plan of the importance of “smaller pieces of open land” (21.2) in providing continuous linkage of green spaces for biodiversity and recreation, and would particularly emphasise the significance of the River Crane valley in this respect, providing as it does a continuous green seam from Moor Mead Park to the western boundary of the borough, through areas of greater residential densification and income and health deprivation than in many parts of the borough.</p> <p>We agree that “residential development is likely to exacerbate...leisure and recreational pressure on existing green infrastructure” (21.3). We have already seen this in the additional pressures experienced at Craneford West Field and Kneller Gardens from successive residential developments at Twickenham Station, Brewery Wharf and Richmond College. We would ask the Council to be creative in avoiding the over-usage of existing green spaces, by for example removing paid-for sporting activities to sites which are better equipped to accommodate them (e.g. mini-rugby to the College Field); exploiting opportunities to link or improve access between existing spaces (e.g. Craneford West Field and the Challenge Court Meadow); and returning strategic brownfield sites to nature rather than immediately redeveloping them (Mereway Day Centre). The Council should indeed “reap[] all the benefits of having high quality, well maintained open spaces and green infrastructure” through its Section 106 negotiations with developers who exact premium prices for developments adjacent to green and blue infrastructure.</p> <p>We support the proposal that “Pedestrian and cycle routes through green spaces should be protected and, wherever possible, provided to a high standard in accordance with best practice guidance.” (21.5) However, it is important that these paths are maintained for dual pedestrian/cyclist usage and not rendered unsafe for pedestrians by aggressive cycling. It is also important that the “green space” characteristics are upheld when selecting the alignments and surfaces of these routes, and in particular that lighting is avoided in dark corridors.</p> <p>We support the recognition that “Green space areas also provide important storm water retention opportunities by minimising surface water run-off rates during severe rainfall storm events” (21.6). We would like the Plan explicitly to recognise the potential for attenuating flooding by naturalising the River Crane below the Mereway Weir, including past Twickenham Rifle Club and through Moor Mead Park. Naturalising the riverbanks and removing protective chainlink fencing would also improve the recreational value of the river for residents.</p> <p>Whilst we recognise the potential for trees to promote urban cooling and provide shade cover (21.6), the Plan should also recognise that inappropriate tree-planting can reduce biodiversity by blocking light which would enable other flora to flourish. We would also like the Plan to make a more explicit commitment to tackling invasive species, both in-river and along the riverbanks. We</p>



		welcome the commitment to “encourage the creation of multi-functional green space wildlife or ecological corridors within new development site layouts” and the advocacy of SuDS (21.7). We also welcome recognition of the need for “long-term management and maintenance” and the commitment to management plans (21.9). We believe that dark corridors are essential for wildlife and that quiet spaces are important for both wildlife and people. We would like to see specific policies developed by the council to protect and enhance dark corridors and quiet spaces as part of this Plan.
Michael Atkins, Port of London Authority (PLA)	Policy 34. Green and Blue Infrastructure (Strategic Policy)	Support reference to both blue and green infrastructure in the policy including the aim to enhance accessibility to open spaces as well as to the blue infrastructure network, particularly to the borough’s rivers and their banks, for leisure and recreational use.
Vicky Phillips, Habitats & Heritage	Policy 34. Green and Blue Infrastructure (Strategic Policy)	para 2. 3. It is essential to protect as well as enhance green corridors, including dark corridors which are used by bats and other species at night. Green corridors across the Borough which connect areas of open space of all types are not properly mapped at present making their protection difficult. The definition of “green corridor” is also not clear – a route used by wildlife to move from site to site e.g. via large trees in streets and private gardens, may not be a green corridor that humans can use. Policy 39 para 1 refers to “protecting ecological or wildlife corridors from development which may destroy, impair or harm the integrity of the corridor”. para 2.4 Protecting biodiversity only within the green and blue infrastructure network, if this is only designated open spaces as defined in para 2.1, will not ensure protection for many of the species most at risk and subject to action plans in the Richmond Biodiversity Action Plan, particularly bats, birds, hedgehogs, stage beetles etc. Policy 39 para 2 sets out a more comprehensive vision of “protecting and conserving priority species and habitats that sit outside the nature conservation network of designated sites and promoting opportunities for their enhancement”. para 2.9 We applaud the introduction of a requirement to provide space for growing food in new developments. This is particularly needed in Richmond Borough as allotment waiting lists are so long. This needs to be part of the design of the landscaping of developments at an early stage.
George Goodby, Environment Agency	Policy 34. Green and Blue Infrastructure (Strategic Policy)	We are pleased to see that the value of green and blue infrastructure is recognised and is included as a separate policy. In point 2.7, we feel the policy would be strengthened if ‘ <i>biodiversity value is protected</i> ’ is changed to ‘ <i>biodiversity value is protected and enhanced in a measurable way</i> ’. This would also tie the policy in more closely to the net gain requirements outlined in Policy 39: Biodiversity and Geodiversity .
Philip Briggs, Richmond Bat Species Action Plan Steering Group	p.242 21.7	“...the Council will encourage the creation of multi-functional green space wildlife or ecological corridors within new development site layouts...” We would like to see some wording about ensuring wildlife corridors are functional during the night as well as during the day. Unless completely unavoidable, wildlife corridors should have no spill from artificial lighting which has been shown to have detrimental effects on bats, including increased vulnerability to predators and disturbance of roosts and commuting and foraging areas (see https://cdn.bats.org.uk/uploads/pdf/Resources/ilp-guidance-note-8-bats-and-artificial-lighting-compressed.pdf?v=1542109349 - page 8). Richmond-upon-Thames is important for bats within the London context, thanks to large areas of green space which support at least ten species (see https://habitatsandheritage.org.uk/wp-content/uploads/2020/11/RBP-Bats.pdf-resize.pdf). A relative richness in biodiversity in the London context should be recognised as an important part of the borough's character and bats are a notable component of this (along with other species which have Richmond borough species action plans). However, the wide extent of artificial lighting in the borough causes fragmentation of bat habitat which can restrict bat movement between sites. To prevent this from worsening we need the introduction of new lighting to be kept to a minimum and opportunities taken to review the need for existing lighting in areas adjacent to important bat habitat with the aim of reducing or even removing the lighting as appropriate. See our final comment below for more details of key areas where we would like to see no new lighting and a review/reduction of existing lighting.
Philip Briggs, Richmond Bat Species Action Plan Steering Group	p.242 21.7	Please could the commitment stated in 12.7 be explicitly included in each of the larger specific site development plans. Examples where this is missing include: p.63 Site Allocation 10: St Mary’s University. There should be a statement about the potential biodiversity value of the site and connectivity via the Thames to the extensive wildlife habitat of Ham Lands/Young Mariner’s Club should be stated. p.132 Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake. Development of this site should include greater provision for biodiversity, incorporating provision for roosting bats (to replace any bat roost potential that is lost), including a wildlife corridor between the river and Mortlake Green. The plan does mention green space and a link between the river and the green for people but please could we have a biodiversity commitment for this site?
Joan Gibson	Page 240	enhancing our blue and green infrastructure. Many community groups and members want to enhance their local area bit face many barriers from LBRuT. A policy of encouraging community groups and council officers trained to work with them will really accelerate improvements across the borough and attract external funding.
	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	
James Armstrong, Richmond Cycling Campaign	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	- C. It will be recognised that there may be cases where inappropriate development, such as small-scale structures for essential utility infrastructure*, or cycle storage* may be acceptable. - D. Improvement and enhancement of the openness, character and use of the Green Belt and Metropolitan Open Land will be encouraged where appropriate. Measures could include improvements or enhancements to landscape quality (including visual amenity), biodiversity (including delivering biodiversity net gain) or accessibility *(including both for disabled persons, and for those travelling via Active Travel modes)*.
Theresa Oddelm, The Royal Parks	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space	We are very aware of the importance of this policy and its equivalent in the NPPF and London Plan, given that both Bushy and Richmond Parks are designated MOL, and therefore welcome the inclusion of the policy in the Local Plan.
Alice Shackleton, on behalf of The Kew Society	Policy 35 Green Belt, MOL and LGS	A : change "very special" to "exceptional" - these spaces must be given the fullest protection
Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	We welcome the very clear statement that “The borough’s Green Belt and Metropolitan Open Land will be protected and retained in predominantly open use,” and the associated test of ‘very special circumstances’ for development. We also welcome the commitment that “When considering developments on sites in proximity to Green Belt or Metropolitan Open Land, any possible visual impacts on the character, local distinctiveness, and openness of the Green Belt or Metropolitan Open Land will be taken into account.” As noted above, we are particularly concerned to uphold the sense of “escape” and associated mental-health benefits provided by natural vistas uninterrupted by visible and overbearing developments; and we are keen to avoid the intrusion of light from such developments into dark corridors. We welcome the proposal to make no changes to the borough’s Green Belt boundaries (21.14)
Tim Catchpole, Mortlake with East Sheen Society	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	There is no mention here of the importance of playing fields and other Green Belt land as flood storage areas. On the Brewery site, for example, the playing fields are in Flood Zones 2 and 3 and should remain green. Incidentally we are aware that the Mortlake Brewery Community Group applied to the Council to have these playing fields designated as Green Space but that there has been no positive response and we would like to know the reason.
Jon Rowles	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	Terminology should match that in the NPPF and London Plan more closely otherwise developers and their expensive barristers could get around it.
Vicky Phillips, Habitats & Heritage	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	Policy 35 - Removal of MOL designation from carpark for Sainsbury’s, Uxbridge Road, Hampton – see above [See comment on site allocation].
Alice Roberts, CPRE London	Policy 35 - Green Belt, Metropolitan Open Land and Local Green Space	The wording of this policy is not compliant with London Plan or NPPF. It suggests MOL has policy goals and therefore leaves MOL in the borough open to threat from development.

Nina Miles, GLA on behalf of Mayor of London	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	We are pleased to note the strong protection of the Green Belt in accordance with policies G2 and G3 LP2021 and that you are following recommendations of the Open Land Review 2021 that recommended all designated Green Belt for retention. With regards to MOL we note that the study identified the majority of MOL as performing strongly but with some specific areas scoring weakly against MOL criteria including the Sainsburys car park, Hampton site that you are proposing for release and allocation for 100% affordable housing along with restoration and enhancement of the wildlife corridor. I note that you are also proposing to release two sites that comprise of front gardens. Any alterations to the boundary of MOL should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of Policy G3 LP2021. None of the three sites appear to meet the criteria for inclusion as MOL and therefore the Mayor raises no objection at this stage to the proposed release of these sites, subject to detailed justification being provided in the supporting evidence.
Gary Rhoades-Brown	Green Belt, MOL, LGS and OOLTI Review	Given the acute development pressures in the south east and in south west London, I am particularly interested in Green Belt boundaries and maintaining the openness of the Green Belt. I agree with the ARAP study that all of the Green Belt is performing well against the criteria within the NPPF. I am pleased to see that there are no proposals to amend the Green Belt boundaries in this Local Plan. I live in Hampton. I am generally supportive of the specific allocated site proposals for Hampton with the following caveats - The existing car parking facilities supporting the Uxbridge Road Sainsbury store are critical for its operation. Adequate car parking must be retained for customers. Releasing the MOL designation for 100% affordable housing development will only work if a very large car park is retained for customers visiting the store and parking facilities are provided for the new development. - Similarly, the Hampton Square proposals must take into account that adequate car parking for customers of the shops be retained. The car park is sometimes full and cars spill out and park on the adjacent road creating difficulties for moving traffic. This occurs at school drop off and pickup times and when there are functions in the White House. Further development may necessitate additional car parking. Clarification within the wording of these site specific proposals would alleviate my concerns.
Peter Willan and Paul Velluet, Old Deer Park Working Group	MOL Review – naming of Parcel 28 and Parcel 31	The Arup MOL Review Annex Report; a Parcel 28 page 92 is titled Little Green. It should be Richmond Green, b Parcel 31 page 101 is titled Thames Old Deer Park. It is not part of the Old Deer Park.
David Taylor	Former Thames Water Operational land adjacent to west of Sunnyside Reservoir, Lower Hampton Road, Hampton	The pre-publication version for consultation of the future 2024 Plan (page 2 of ‘ <i>Sites not to be Considered</i> ’ document) states that my above pocket of land will be excluded from review because ‘ <i>the site is located within the Green Belt AND the Open Land Review 2021 found that the (defined) General Area (part of area No 5) performed strongly against the NPPF Green Belt purposes. In the light of this, there are no proposed changes to the Green Belt boundary in draft Local Plan</i> ’. <u>The first GB claim is simply untrue: for the second my land is extremely weak in meeting NPPF criteria.</u> <u>1/ Claimed designation as Green Belt</u> Both the Spatial Planning and Design Team Manager (Ms Kitzberger-Smith) and the Cabinet Member responsible for Environment & Planning (Cllr Elengorn) are well-aware of the contentious short shortcomings & omissions in their claimed GB designation process of this pocket of land (it’s boundary identified in BLUE on attached map). A brief history: - • Until 1993 the land, then owned by as Thames Water, was part of Spelthorne BC who have confirmed that it was not designated as GB in their UDP of 1991. Contemporary maps show the designated GB boundary (in GREEN) directly following the prominent and permanmat western and southern Reservoir embankments of Sunnyside and Stains Hill Reservoirs respectively (highlighted in YELLOW) – ‘ <i>using physical features that are readily recognisable and likely to be permanent</i> ’ - exactly as recommended in NPPF legislation. • In 1993 , the LB Richmond <i>administrative</i> boundary was moved westwards (shown in RED), to incorporate the whole of the Sunnyside reservoir plus was dog-legged to also include my adjacent ‘blister’ patch of storage land, rather than the significant physical reservoir bfeatures.. • The October 1996 adopted Richmond UDP includes policy statement ENV4, with supporting maps, specifically identifying some newly approved GB land designation to the south and east of Sunnyside reservoir (shown by BROKEN GREEN line). These location changes are crystal-clear on Map 4 in this UDP. There is no policy claim that makes any reference to any GB extension westwards to encapsulate my small outlier patch of adjacent land, containing storage sheds and hard standing. The UDP did also included a ‘summary’ map claiming to show all GB in the Borough in which my pocket of land appears coloured green – there is no supporting commentary or policy justification for this implied change to the GB boundary to encapsulate what later became my land. This identical map has since been simply duplicated, still without any comment justifying such a change, in Richmond’s LP’s of 2005 and 2019. Both these LP’s confirm they avoided any review of GB land and state no further changes to Borough’s GB were made (after 1996 policy ENV4). • I purchased the orphan plot of land in 2016 after sight of the new 2016 Hampton Village Plan SPD map and the usual property searches; neither showed my land as GB. The published 2016 Planning document, contained a preface stating it ‘ <i>can be used to guide new development</i> ’ with a ‘ <i>Green Infrastructure in Hampton</i> ’ map clearly showing my land as not being GB designated, exactly in-line with the ENV4 policy and map of the earlier 1995 UDP – clarifying, as the latest published planning document, the lack of clarity created by the contradictory UDP maps. After full public consultation, the 2016 Hampton SPD document & map were adopted, without change, by Richmond Council on 1.6.2017 and subsequently became an integral part of Richmond’s final 2018 LP. • I was thus totally surprised to be told at a Pre-App meeting in 2017 that ‘ <i>Richmond consider the land to be GB. We consider all Thames Water land to be GB</i> ’. An identical spurious claim of ownership justifying designation was made by the LBRUT Solicitor in 2019. Land ownership has never been a criterion under NPPF to justify GB designation. • At the same time Borough Solicitor confirmed that LBRUT do not have ANY evidential records of due process of proposal, public consultation, nor the specific Council numbered policy approval required to legally designate my land as GB. The only logical place for such a record to reside would be in the 1996 UDP document – that UDP document still exists and is complete but contains no such record. Ergo, without evidence, any such a claim by Richmond of GB designation is invalid. <u>2/ My pocket of land’s performance against NPPF GB criteria</u> The larger ‘General Area 5’s performance probably does ‘perform strongly’ against NPPF GB purposes – apart from my small pocket of land within it. My lands performance against the 3 relevant NPPF Purpose criteria of 1/ checking unrestricted urban sprawl 2/ preventing neighbouring towns coalescing 3/ and safeguarding the countryside, is considered below • Against PURPOSE ! . My small, orphan patch of land (BLUE) is firmly constrained on all 4 sides: - - to the west and south (all in Spelthorne BC) by long-established residential properties. – - to both the east and north it directly abuts the substantial physical embankments (YELLOW) of Stain Hill and Sunnyside reservoirs – already existent for in excess of a century. Historically, under Spelthorne’s custody, the GB boundary (GREEN on attached map) closely followed the Reservoir embankments throughout; Richmond’s purported new GB boundary post 1996 makes right-angle turns away from these physical features to follow transitory wooden residential garden fences and a house driveway. If the latest review was genuinely selecting permanent features for the boundary identification of General Area 5 (as claimed in C1.2.2) the GB boundary would follow the reservoirs’ embankments, as it did under Spelthorne’s custody. C1.2.1.2 goes on to say ‘ <i>in cases where the (claimed) Richmond (general area) boundaries do not coincide with permanent and durable features, General Areas overlap with Green Belt in</i>

		<p><i>neighbouring authority areas to align with the nearest durable feature'</i> (my underlining). Yep, which brings us right back to using the adjacent 'permanent physical feature' - the reservoir embankments, as used by Spelthorne in their 1991 UDP GB boundary (GREEN). Without due consultation, or policy approval Richmond may, or may not (depending on which Richmond map you choose) have added a 'kink' to justify their claimed encapsulation of my small pocket of land,</p> <p>• Against PURPOSES 2 & 3. My land does not protect a gap between 'contiguous' settlements – Sunnyside and Stain Hill reservoirs do that. It is also a brownfield site containing three long derelict storage buildings and a substantial area of concrete hard-standing for vehicles. It is certainly at the 'urban characture' end of the Purpose 3 spectrum, with minimal 'rural' characture'..</p> <p>But for Richmond's repeatedly postulated but flawed claim that my land is GB, a thoroughly objective assessment (under C1.2.1.2) would almost certainly classify my land as an enclosed 'smaller scale sub-area with a view to possible further detailed assessment beyond this Assessment'. To use your phrase, it's a potentially an enclosed 'infill' site.</p> <p>3/ General</p> <p>The 2021 London Plan, as approved by the Secretary of State, required all London Boroughs to review their GB designated land with a view to considering releasing weak GB land for, amongst other things, new-build residential properties of all kinds to address the housing crisis. In the case of Richmond this will be the first such overall GB review in 30 years. The final 2017 LP Examination in Public consultation was emasculated by Council's Pre-Examination instruction to SoS Inspector David Seaman 'to exclude Green Belt from his Examination': he nevertheless was sufficiently concerned about the status of my pocket of land to add 2 paragraphs & a specific codicil into the final LP that Council should satisfy themselves that their GB boundaries concerning this land were correctly depicted and they should correct any errors found. Richmond simply repeated their mantra that they considered all their GB boundaries to be correct – though no evidence was ever provided justifying this conclusion. And the final 2019 LP still includes the Hampton Village Plan SPD document map, approved in 2017, showing my land as non-GB.</p> <p>Even from just desk research, any thorough new survey in 2021 of GB boundaries against NPPF criteria for 'General Areas' (as claimed in sentence one of C1.2.1.2), should have quickly identified the Reservoir embankments as providing the desired '<i>readily recognised and likely to be permanent feature</i>' and '<i>would recognised these principles from the start</i>'. And wholly within LBRUT's administrative area. Did none of the 2021 researchers ever visit Lower Hampton Road to review this known to be anomalous and disputed setting? If not, why not?</p> <p>In reality, my patch of land probably provides the almost perfect example of an 'Infill' site, as defined in C1.2 '<i>Illustration of Connected, Contiguous and Enclosed</i>' land - fully enclosed by residential Lower Sunbury homes on two sides, and the very permanent embankments of Sunnyside & Stain Hill reservoirs on the other two. My land meets all your 'weak' achievement levels of NPPF to be considered for further consideration under Stage 2 review. Yet apparently it has been totally missed, or dismissed. Either way, solely relying on the basis of Officers' knee-jerk view that '<i>its GB because we say its GB</i>'. Unless it is given further consideration in Stage 2 analysis, it will be a travesty of the original SoS Direction for Richmond to undertake an objective review of their GB, including Public and Inspector scrutiny of proposals and their justification at the planned Examination in Public. Such a blinkered approach as excluding a detailed review of my known to be contentiously claimed GB designation site would create a potential flaw in the voracity of the proposed 2024 LP that would then be open to further challenge.</p> <p>Attached: Plan of Boundaries around submission land [See Appendix 11 for a full page version of plan below]</p> 
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 35 – Green Belt, Metropolitan Open Land and Local Green Space	<p>We respond here on MOL status for Richmond Green, Policy 35, which is significantly undervalued by Arup's MOL Review Annex Report, and on Riverside North of Richmond Bridge and Riverside South of Richmond Bridge.</p> <p>Under the heading 'Proposed changes to the Policies Map' the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.</p> <p>(In Arup's 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 'Parcel' (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens 'Parcel' – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside 'Parcel' – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily</p>

		<p>accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that ‘the eastern third of the parcel, is developed and does not meet the MOL criteria’ and that its MOL status should be considered further. The parcel is certainly NOT ‘largely inaccessible to people’ as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.</p> <p>In relation to the The Green and Little Green, Richmond ‘Parcel’ – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of The Buildings of England – London 2: South as ‘one of the most beautiful urban greens surviving anywhere in England’, Richmond Green possesses not only considerable architectural, historic and landscape interest and significance, but importantly, constitutes a public open space of outstanding amenity value to the local and wider community.</p>
Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	<p>We respond here on MOL status and boundary anomalies and seek to remove any question of an important part of the Old Deer Park ceasing to being designated as MOL, as raised in Arup’s MOL Review Annex Report. We comment further on Policy 35 Green Belt, Metropolitan Open Land and Local Green Space.</p> <p>Under the heading ‘Proposed changes to the Policies Map’ the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under ‘Policies Map for the Local Plan Review, 2015-2018’ in the part of the Council's current Planning Policy web-site dealing with the current ‘Adopted Local Plan’ (adopted in July, 2018), it is clearly stated that ‘The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020’. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.</p> <p>(In Arup's 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 ‘Parcel’ (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens ‘Parcel’ – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside ‘Parcel’ – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that ‘the eastern third of the parcel, is developed and does not meet the MOL criteria’ and that its MOL status should be considered further. The parcel is certainly NOT ‘largely inaccessible to people’ as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.</p> <p>In relation to the The Green and Little Green, Richmond ‘Parcel’ – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of The Buildings of England – London 2: South as ‘one of the most beautiful urban greens surviving anywhere in England’, Richmond Green possesses not only considerable architectural, historic and landscape interest and significance, but importantly, constitutes a public open space of outstanding amenity value to the local and wider community.</p>
Anna Stott, WSP on behalf of Sainsbury’s	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space, Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton	[See comment against Site Allocation 5 in relation to the removal of the site from MOL]
Geoff Adams, Putney Town Rowing Club	MOL Review Analysis by Arup - Detailed Version, Site Number 21 - Parcel: Mortlake Cemetery East, Townmead Kew, & Thames Kew East	<p>These comments are on behalf of the Rowing Club.</p> <p>The site MOL 21 is recognised and we are the only rowing club on the Thames between Putney and Kingston.</p> <p>The area covered by MOL 21 should include the car park adjacent to the boathouse/gatehouse together with the school playing field adjacent and to the West.</p> <p>Although the allotments are included in the site there is no mention of them in the text.</p>
Arthur Gelling	MOL Review Parcel 42: Fulwell Golf Club	<p>My response relates to the MOL review – and in particular, the proposal to remove MOL status from the Sainsbury St Clare car park, which connects MOL1 to the David Lloyd site (within MOL42). MOL 42 “Fulwell Golf Course” while I don’t disagree with the outcome (“conserve” status) on MOL 42, I am really concerned by the number of inaccuracies, errors and omissions in such a brief summary:</p> <ol style="list-style-type: none">1. The first photo is titled as Strawberry Hill GC – either the wrong site/photo, or caption2. There is a reference to only the one (private) Fulwell Golf Course, but no mention of the publicly accessible (fully walkable) public (membership not required) Twickenham Course run by David Lloyd – which occupies around one-third of the total MOL area. This surely profoundly changes the sports/leisure access and green space accessibility assessment.3. There is no mention of the public access semi-natural grassland and scrub areas behind David Lloyd – popular as kickabout, dog-walking, picnicking, exercise groups etc. again impacting on score for access for the public.4. There is no mention of the allotments alongside the B358 Sixth Cross Road... which must also count in scores for public use/access.5. The report states “there is no direct public access to, or within the parcel” This is despite the fact the London Loop strategic footpath (public right of way runs north-south straight through the MOL) and there is public access to around one-third of the MOL area.6. The “Place” is titled as “Twickenham, Strawberry Hill and St Margarets”, but it is actually between Twickenham, Hanworth (not “Hamworth” as per typo in another paragraph) and Fulwell.7. There is no mention of the Burton’s Road area’s deficit in local open space provision – though I suppose this may not be an MOL criterion, even if it is of importance within the Borough.8. The neutral / lowland acid grassland, found within the David Lloyd “Hampton Heath” area and both golf courses, emerging scrub habitat, and numerous 200 year old oak trees, protected species (such as grass snake), unusual invertebrates, waxcap fungi etc. and SINC status suggest a higher score for biodiversity. Again no mention made of any of these features.9. MOL42 directly contributes to habitat/greenspace connectivity due to its proximity to the rail corridor (which is not mentioned, but is a well-established, continuous linear green corridor) as well as its indirect connectivity to Longford River – which is mentioned. This means the site contributes to broader habitat and green infrastructure connectivity to a greater degree than is recognised in the report. <p>Unless there are defined “procedural reasons” in the MOL review process, I think these errors/omissions could have significant potential to result in higher scores for the MOL Criteria (especially 2, 3, and 4), and should be reviewed.</p>

Arthur Gelling	MOL Review Parcel 1: Longford E & Schools	<p>I am a Chartered Landscape Architect with 32 years’ experience of working with landscape policy. I have lived in Hampton Hill for more than 30 years, and have practiced from a home office for the last two years. I am also now Chair of a recently formed Hampton Heath Friends Group (affiliated with Habitats and Heritage) which is currently cleaning up and introducing habitat management to the areas behind David Lloyd, Hampton, and I attend SWLEN/Richmond Biodiversity Partnership meetings.</p> <p>My response relates to the MOL review – and in particular, the proposal to remove MOL status from the Sainsbury St Clare car park, which connects MOL1 to the David Lloyd site (within MOL42).</p> <p>Comments on the MOL Review are as follows:</p> <p>On MOL 1 (Longford E and Schools:</p> <ol style="list-style-type: none">1. Photo annotations are incorrect (references to “Richmond Park” and “developed northern parcel section”)2. The school playing fields do not separate Fulwell and Hanworth as stated.3. Contrary to “There is no public access or PRoW within any part of the parcel” and “No PRoWs” there is a public right of way which crosses the Longford at Longford Close4. The statement that the parcel “is likely to contribute to a wildlife corridor” is something of an understatement. It is a SINC.5. There is no mention of the Longford River’s extraordinary historic and cultural heritage value, and its historic origins and ongoing function serving the waterways and fountains of Bushy Park and Hampton Court.6. The conclusion seeks to differentiate between the value of the northern and southern portions of the Longford corridor – which are near identical in width, vegetation, channel and therefore value. The only difference is the adjacent school sports fields. <p>The northern portion of MOL 1 which is effectively “written off” by Arup does retain some natural and cultural heritage value, due to the corner of the Sainsbury car park site which is given over to dense tree planting, and a continuous band of trees and planting which follows the historic Borough Boundary. The mature tree row is continuous with that on the other side of the A312 Hampton Road East – MOL 42 (and SINC). The planted boundary strip was a Condition of the original planning for the Sainsbury site and still provides a narrow movement corridor for some wildlife. But the Sainsbury St Clare portion of the MOL has real importance in its retained potential to *reconnect* MOL 42 to MOL1 as a continuous habitat feature linking the rail corridor (east of MOL 42) to the Longford Corridor. Retaining at least a portion of this area as MOL corridor is therefore important to fulfilling Borough and London policy to reconnect habitats if/when the Sainsbury site is redeveloped.</p>
George Voss, WSP on behalf of Petersham Nurseries Ltd	MOL Review Parcel 8: Ham House, Douglas House, Richmond Hill Rise, Ham Common, Ham Polo, Buccleugh Gardens, Greycourt School, Petersham Lodge, Peterham Meadows	<p>We have reviewed the Richmond Local Plan ‘The best for our borough’ and are broadly supportive of the Council’s approach and the policies set out within it. We are supportive of the economic policies given PNL is a major employer in the Borough. PNL has been open to the public since 2004 under the current ownership and employs over 170 staff who support retail and food and beverage. PNL prioritises employing locally with staff comprising of both full and part-time, the majority of whom live within a 5-mile radius. The business provides local employment opportunities across a range of sectors including buying, finance, marketing, human resources, retail, food and beverage, on site gardening, maintenance and floristry.</p> <p>PNL is located with Metropolitan Open Land (MOL), but this designation fails to meet the four criteria set out under London Plan Policy G3. We therefore suggest the boundary of the MOL should be revised and this is set out in further detail below.</p> <p>Metropolitan Open Land</p> <p>The Local Plan includes a review of the performance of the MOL against the designation criteria set out in Policy G3 of the London Plan. In order to be classified as MOL, land must meet four criteria. Land is assessed against the following criteria:</p> <ul style="list-style-type: none">▪ Criteria 1: Contribute to the physical structure of London by being clearly distinguishable from the built-up area;▪ Criteria 2: Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;▪ Criteria 3: Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value; and▪ Criteria 4: Forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria. <p>Where Criteria 1-3 score ‘moderate’ or above (scoring a 3 out of 5), the plot will be assessed against Criteria 4. If all criteria are met and score a 3 or above on all criterial, the site will be retained within the MOL.</p> <p>The evidence base for the Local Plan, the Metropolitan Open Land Annex Report 2021, confirms that PNL is located within Parcel 8 “Ham House, Douglas House, Richmond Hill Rise, Ham Common, Ham Polo, Buccleugh Gardens, Greycourt School, Petersham Lodge, Peterham Meadows”. See Figure 1 below showing the location of the MOL and PNL has been outlined in blue.</p> <p>Figure 1. <i>Parcel 8 MOL Boundary as currently drafted with PNL outlined in blue</i></p>  <p>PNL is surrounded by a high brick wall which clearly creates a physical boundary between the site and the wider MOL designation. Within the site, there are several permanent structures, including glasshouses, brick and timber buildings housing the restaurant preparation areas, toilets, staff offices and the teahouse. There are also temporary structures in the form of tables and chairs associated with the teahouse throughout the site.</p> <p>The MOL boundary for Parcel 8 rightly excludes the built-up form of development to the south of the site along Petersham Road and River Lane. However, when viewing the site on a map, it is clear that PNL is part of the built form and is physically and developmentally distinguishable from the open land at Petersham Meadows and Petersham Lodge to the north and northwest of the site.</p> <p>In June 1998, PNL was granted a Certificate of Lawfulness for Existing Use or Development (CLEUD) to establish the unrestricted use of the site for a garden centre under reference 98/0525. This CLEUD established the site as an open A1 use. The Use Class Order was updated in September 2020 and the operation of the entire PNL site is now Class E. On this basis and the way PNL operates, PNL does not meet MOL criterion 1 or 2.</p> <p>MOL Criterion 3 is not applicable to the site as PNL does not include any statutory or locally listed buildings nor contain features or landscapes of either national or metropolitan value.</p>

		<p>Whilst the surrounding area provides well connected green spaces an essential part of green and blue River Thames corridor of regional importance, the PNL itself does not provide a node or link in this network and does not meet criteria 4.</p> <p><u>Revised MOL Boundary</u></p> <p>As outlined above, PNL fails to meet all of the criteria to designate the MOL and the MOL boundary for Parcel 8 should be revised accordingly. The dense hedgerow and wall located immediately north of PNL provides a natural buffer between the site and Petersham Meadows which is distinguishable from the built environment (which includes PNL). We encourage the Council to revise the MOL boundary to exclude PNL (the area hashed in red below).</p> <p>Figure 2. <i>Proposed revised boundary for Parcel 8.</i></p>  <p>Conclusions</p> <p>The site falls within Class E use and is a legible part of the developed area to the south and west of the site and the site no longer fulfils the MOL criteria set out in London Plan Policy G3. The boundary for the MOL should be redrawn to exclude the site.</p> <p>We hope that these representations will be incorporated in the next iteration of the plan, and that the Council takes this opportunity to engage constructively with PNL as a major investor and employer in the Borough.</p>
Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	Metropolitan Open Land / Policy LP35	<p>London Plan Policy G3 (Metropolitan Open Land) sets out the purposes for designating MOL as follows:</p> <ol style="list-style-type: none">1. it contributes to the physical structure of London by being clearly distinguishable from the built-up area2. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London3. it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value4. it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria. <p>Policy G3 further states that alterations to MOL boundaries should be undertaken through the Local Plan process, when fully evidenced and justified.</p> <p>The context of site allocation SA13 acknowledges that part of the site is designated Metropolitan Open Land (MOL). An extract of the MOL parcel (no.36 - Kneller Chase Bridge) from the Metropolitan Open Land (MOL) Review Annex Report (detailed assessment) is provided as Figure 2 below.</p>  <p>Figure 2 – MOL Parcel 36 (shaded green)</p> <p>The context states that the, "<i>Open Land Review 2021 found that the MOL strip of land to the east of the river should be improved as it forms part of the valued green corridor at the Duke of Northumberland's River to enhance provision for wildlife and access</i>". However, p.117 of the Metropolitan Open Land (MOL) Review Annex Report (detailed assessment) (2021) states: "<i>The eastern edge of the parcel, hard standing associated with Twickenham Stadium, meets none of the MOL criteria and it is recommended that its MOL status is considered further</i>".</p> <p>An extract of the Report is provided as Appendix 1 [See Appendix 12 to this schedule]. We consider the MOL Review Annex Report evidences and justifies the de-designation of the eastern edge of the parcel, in accordance with London Plan Policy G3.</p> <p>Photographs showing how this area is used on match days and the general condition of the land are provided as Appendix 2 [See Appendix 12 to this schedule].</p> <p>We therefore request that the strip of land and area of the allocation, is updated to properly reflect the Review's findings, and the hardstanding associated with the stadium is removed from MOL given it meets none of the MOL criteria. Associated amendments to the Proposals Map should therefore be made.</p> <p>We suggest that this extract of the Site Allocation is reworded as follows. Current wording:</p> <p><i>"Part of the site, adjacent to the Duke of Northumberland River, is designated Metropolitan Open Land (MOL). The Open Land Review 2021 found that the MOL strip of land to the east of the river should be improved as it forms part of the valued green corridor at the Duke of Northumberland's River to enhance provision for wildlife and access. Therefore, any development proposal is required to protect and, where possible, enhance, the Duke of Northumberland River, including access to it, and the associated MOL."</i></p> <p>Proposed wording:</p>

		<p><i>"Part of the site, adjacent to the Duke of Northumberland River, is designated Metropolitan Open Land (MOL). The Open Land Review 2021 found that the hard standing associated with Twickenham Stadium meets none of the MOL criteria and as part of this Local Plan Review, such land is removed from the designation. Notwithstanding, any development proposal would be required to meet Policy 35, and take into account possible impacts on the character, local distinctiveness and openness of the MOL adjacent".</i></p> <p>Associated with the above, we suggest that the text below Draft Policy 35 (p.243) is updated. We propose that a fourth change to the Policies Map is added (addition in red below).</p> <p><i>"Proposed Changes to the Policies Map</i></p> <p><i>A. Further to the recommendations in the Green Belt, MOL, LGS and OOLTI Review (2021), the following sites will have their MOL designation removed.</i></p> <p><i>1. Carpark for Sainsburys, Uxbridge Road, Hampton (see Site Allocation 5)</i></p> <p><i>2. Parcel 48 of the Review: Front Gardens Hampton Court Road (East) - The parcel is a very small linear section comprising front gardens to residential properties along Hampton Court Road.</i></p> <p><i>3. Parcel 49 of the Review: Front Gardens Hampton Court Road (West) - The parcel is a very small linear section comprising front gardens to residential properties along Hampton Court Road.</i></p> <p><i>4. Eastern edge (hardstanding associated with Twickenham Stadium) within Parcel 36 of the Review: Kneller Chase Bridge - This portion of the parcel which is linear, does not meet any of the MOL criteria.</i></p>
Ian Anderson, Lichfields on behalf of David Lloyd Leisure Ltd (David Lloyd)	Policy 35 – site specific MOL designation	<p>Background</p> <p>David Lloyd is Europe’s premier health, racquets and fitness provider. David Lloyd has operated for over 30 years and owns some 99 David Lloyd clubs in the UK (including 3 Harbour Clubs) and a further 23 across Europe and the Republic of Ireland. David Lloyd has further ambitious growth plans both in the UK and Europe.</p> <p>The business has some 600,000 members and is a significant employer in the health and fitness market, employing over 8,000 people. These include an expert health and fitness team of over 2,000 professionals and more than 680 tennis coaches. David Lloyd Clubs had been awarded a Sunday Times Top 25 Best Big Companies award for the past four years, most recently in 2020.</p> <p>David Lloyd’s racquets’ facilities are unrivalled in the UK, with some 1000 tennis courts, 400 badminton courts and squash courts.</p> <p>In addition to the racquets’ facilities, across all clubs, David Lloyd has over 150 swimming pools and the company offers more than 10,000 exercise classes every week.</p> <p>David Lloyd also provides significant coaching programs for children, both as part of the normal operation of its clubs and as ‘outreach’ to local schools, colleges and other amateur organisations.</p> <p>It is estimated that every week some 25,000 children swim and some 16,000 receive tennis coaching at David Lloyd clubs.</p> <p>In addition to the core activities of racquets and health and fitness, a number of clubs also benefit from health and beauty spas, lounges, food and beverage, crèches, nurseries and specialist sports shops.</p> <p>The COVID-19 pandemic has brought into sharp focus the need for both fitness and mental resilience and David Lloyd are at the forefront of development both in fitness innovation across its clubs, and mindful-wellness through its classes and spas and approach to outdoor, as well as indoor, sport and recreation.</p> <p>Property Aspirations and Requirements</p> <p>In both the UK and Europe David Lloyd are continuing to expand and grow its portfolio whilst investing in its existing club estate.</p> <p>This investment in existing assets is necessary both to maintain a quality offer, given changing focuses in, sports and recreation and to ensure that clubs remain relevant and up to date, given significant parts of its portfolio are 25+ years old.</p> <p>Examples of this include investment in Spa facilities and outdoor Spa Gardens to respond more fully to health and well beings, greater in door tennis provision through permanent and seasonal all weather domes, outdoor pools and children’s play facilities.</p> <p>Employment</p> <p>David Lloyd’s largest format of club generates circa 80-100 full time equivalent jobs.</p> <p>The club targets local employment opportunities in the appointment of full time, part time and self-employed staff. In the majority of cases therefore, employment is sourced locally, targeting local job markets to fulfil the needs and function of the club. Additional services, including cleaning contractors, deliveries for the restaurant and maintenance requirements are, again, sourced locally where possible.</p> <p>Metropolitan Open Land: Policy 35</p> <p>The MOL, as presently drawn by LB Richmond and proposed in the draft plan, does not follow any defensible boundary, cutting through the David Lloyd Club, its car park, outdoor pool and terraced areas and excluding the hard surface tennis courts. The drawn boundaries of MOL across the David Lloyd Club are therefore indefensible (see below).</p> <div data-bbox="997 1312 1958 1627"></div> <p>The David Lloyd Club represents a significant built structure close to the junction of the A315/A302 with the A316 (Great Chertsey Road). Land to south of the Club is used for Golf practice and is considered by us to be weakly performing MOL. This could be released from the MOL, given its isolated nature.</p>

		<div></div> <p>As part of the Reg.19 Review, the whole of the David Lloyd site should be excluded from MOL. This should include Club buildings, car park and tennis courts. Moreover, we further consider a defensible boundary could be drawn, southwards from the tennis courts, to exclude the southern portion of isolated MOL land, south of the Club to exclude this area of MOL, which appears to be ‘weakly performing’ in our view having regard to the wider MOL function. This area of MOL is largely self-contained, significantly annexed by the David Lloyd development with a ‘bell mouth’ to this part of the MOL being only approximately 35m and is well screened from the Road and surrounding residential properties. We note that the Council’s assessment of the wider MOL within this area scores weakly across two of the criterion for MOL, and only moderately / moderately strong across the remining, Importantly no assessment is made of this southern portion of MOL, south of the Club which we consider annexed by the position of the MOL and in our view scores weakly. We therefore recommend changes to the text below Policy 35 excluding this area of land.</p> <p>[See comment in relation to Policy 39 and the SINC designation]</p> <p>Conclusion</p> <p>We appreciate that this is an early pre-publication stage of the document, however we would be grateful for these representations to be taken into account ahead of the publication of the Reg.19 Plan. We would welcome the opportunity to discuss the Representations further ahead of the Council’s drafting of its Reg.19 Plan.</p>
David Wilson, Thames Water	Policy 35 Green Belt - Hampton Water Treatment Works (WTW) – Proposed Green Belt deletion	<p>Hampton WTW is located in the Green Belt and given that it is one of the largest operational WTW and there will be a requirement for upgrades to support growth it is considered that the opportunity should be taken to remove the site from the Green Belt as part of the Gren Belt Review to help facilitate development which will be necessary to support growth within the Borough and surrounding area.</p> <p>Hampton WTW was previously identified as an existing Major Developed site in the Green Belt in a previous adopted development plan in accordance with the former Planning policy Guidance Note 2 (PPG2) on Green Belts. However, PPG2 was removed with the publication of the NPPF which does not include provision for the designation of Major Developed Sites in the Green Belt. The Council did not therefore agree to designate Hampton WTW as an existing Major Developed Site in the current Local Plan in line with the NPPF.</p> <p>The operational Hampton WTW occupies 74.3 hectares (183.6 acres), is Thames Water’s second largest works and is of strategic importance for London’s water supply. It will be inevitable that further upgrades will be required over the plan period to increase capacity to meet growth being proposed in the London Plan and Local Plans or meet new treatment standards. Given that the WTW is essential infrastructure it is considered that there are exceptional circumstances to remove the Hampton WTW from Green Belt designation, as set out on the enclosed plan, in accordance with Policy G2 of the London Plan 2021. Essential upgrades to the WTW may be necessary to support growth and deliver environmental improvements. In this context development of the site will be essential to support growth and deliver sustainable development in line with the development plan strategy. The site is not currently open and incorporates significant areas of concrete/brick/metal tanks, plant, machinery and buildings and as such it would not be necessary for the site to remain open. There are a number of water bodies on the site, but these are man made filter beds and reservoirs which could not be maintained as such in perpetuity if they were to become redundant. As such, the designation of the WTW site as Green Belt goes against the requirements for designation of Green Belt land set out in Paragraph 139 of the NPPF.</p> <p>The aerial photo below illustrates the built up nature of Hampton WTW:</p> <div></div> <p>Paragraph 134 of the NPPF states that Green Belt serves five purposes: to check the unrestricted sprawl of large built up areas; prevent neighbouring towns from merging; assist with safeguarding the countryside from encroachment preserve the setting and special character of historic towns and assist in urban regeneration. Given that the WTW site is existing developed site with built development and infrastructure on which further development will be required in the future in order to facilitate sustainable development within the borough and surrounding area, the site is not considered to align with the purposes of the Green Belt set out in Paragraph 134. It is therefore considered that the opportunity should be taken to remove the Hampton WTW from the Green Belt.</p> <p>We disagree with the findings of the Green Belt, MOL, LGS and OOLTI Review undertaken as evidence base for the Local Plan, and consider the site does not perform strongly in Green Belt terms. The Green Belt review is unclear as to which settlement sprawl is being referred to as the River Thames separates Molesey and Hampton and this part of Green Belt is not strategic in the whole parcel. The assessment of the entire parcel is flawed as it includes a number of different characters which perform differently against the Green Belt functions. To assume all of the land, including buildings and physical infrastructure is ‘high performing’ Green Belt is clearly flawed. It is therefore considered that the site should be removed from the Green Belt.</p>

Mark Jopling, Udney Park Playing Fields Trust	Udney Park Playing Fields	<p>Please find the submission from the Chair of the Udney Park Playing Fields Trust, the charity set up in 2017 to protect Udney Park. The charities purpose is to ensure that the Pavilion and all of the surrounding green space serve the original founding charities' purpose that the site is a "War Memorial Sports Ground" and that a War Memorial Pavilion and Playing Field is maintained and accessible.</p> <p>We welcome the retention of Udney Park as an Asset of Community Value and Local Green Space in the Local Plan Pre-Publication Version. The additional protection confirmed by Council Committee in November 2021 that the Udney Park Pavilion is a Building of Townscape Merit and maintains its' status as a recognised War Memorial is important, especially as 2022 is the Centenary of Udney Park opening ceremony.</p>
Vicky Phillips, Habitats & Heritage	New Local Green Space sites	we support these designations and would also ask you to consider Teddington Library Garden as an additional LGS.
	Policy 36. Other Open Land of Townscape Importance (OOLTI)	
Philip Briggs, Richmond Bat Species Action Plan Steering Group	p.247, paragraph 21.24	One of the criteria for defining Other Open Land of Townscape Importance (21.24) is “Value for biodiversity and nature conservation and meets one of the above criteria”. Why is this the sole criterion which cannot stand on its own? Could the qualification "and meets one of the above criteria" be removed?
Peter Eaton	Section 21 Policy 36 - Other Open Land of Townscape Importance (OOLTI) Clause 21.25 - pg 247	<p>The previous iteration of the Local Plan - now active - included a clause to permit in exceptional cases the development of OOLTI land and applied a clause dealing with re-provisioning in terms of new open space, equivalent or improved in terms of quantum, quality and openness.</p> <p>I would wish to see the definition of quantum and openness defined far more precisely and not left to arbitrary interpretation. An existing OOLTI space of say one large block of land of 1.0Ha is NOT re-provisioned by equivalent or improved new open space if this is composed of say 5-10 new spaces of 0.2 - 0.1Ha. This could never be interpreted as equivalent of indeed improved and would also not pass the test in terms of openness. Even if the new spaces were of high quality they could never act as replacement in terms of quantum/openness to a larger open space of 100m x 100m say (1.0Ha). Over the borough of Richmond there are many high quality open spaces but only a few have been assessed and designated as OOLTI.</p> <p>In relation to the quantum the following definition should be applied, or some such similar wording – <i>'Quantum is defined as new open space of broadly equivalent proportions to the existing OOLTI space'.</i></p> <p>In terms of openness the same principles must apply. A large single space of say 1.0ha, however configured, cannot be considered to have been reasonably re-provisioned by a series of smaller spaces. Again the definition of 'openness' ought to be better defined to avoid mis-interpretation.</p> <p>The Council's allocation of OOLTI in the borough has been guided by specialist consultant advice and the council's own specialist officers in terms of planning, conservation and landscape. It is vital therefore that the concept of replacement or re-provisioning is far more tightly controlled with suitable and measurable definition. Furthermore, if OOLTI land is to be re-provisioned as part of some exceptional case, and/or comprehensive re-development for major schemes or regeneration proposals, then the timing of such re-provisioning should be controlled. It would be unacceptable to say lose an OOLTI space in an early phase of a long-running major scheme only to be re-placed in the last phases - no matter how enhanced any new space may eventually become. This should not be left to a Section 106 Agreement Clause but should be defined in Policy 36 itself with wording such as – <i>'Any re-provisioned OOLTI space should be provided as early as possible in the initial phase of any major scheme or re-generation project'</i></p> <p>Wording should be added to Clause 21.25 or new clauses added to define quantum, openness and timing of delivery far more specifically for such important elements of the boroughs character and attributes.</p> <p>Richmond's green open spaces are voted by the public as one of its primary attributes and ought to be appropriately protected.</p>
Tim Catchpole, Mortlake with East Sheen Society	Policy 36. Other Open Land of Townscape Importance (OOLTI)	No comment but, as mentioned elsewhere, we are concerned about the re-provision of the OOLTI on the Brewery site as we question the quality, character and biodiversity of the reprovisioned space.
James Stevens, Home Builders Federation (HBF)	Other Open Land of Townscape Importance (OOLTI) site specific designations	[See comment relating to OOTI and sites 57 and 59]
Joan Gibson	Page 246 (relevant to proposed site-specific OOLTI designation)	<p>I really support our green at Ellerman avenue receiving protection by becoming OOLTI. Thank you for this - more of our small greens could do with OOLTI status. Things do change in the time it takes to update the local plan, and we "Friends of Heathfield Recreation Ground and Environs" along with about 12 local volunteers recieved funding from LBRuT's Local fund to "wild" up Ellerman Green last year. In our first year we have managed to transform it from a bit of short grass with a few trees which very few people visited to a wildlife rich area which attracts a significant amount of use as people visit and walk over what is a more interesting area.</p>  <p>The extra protection just any designation brings with it is more than welcome as we continue our work on the green.</p>

	Policy 37. Public open space, play, sport and recreation	
Theresa Oddelm, The Royal Parks	Policy 37 Public Open Space, Play, Sport and Recreation	We welcome the inclusion of this policy as it states that public open space, such as Bushy and Richmond Parks, will be protected. We also welcome the provision of new open spaces as part of development which could mitigate potential increases in visitor numbers to existing parks (including the Royal Parks).
Laura Hutson, Sport England	General in relation to evidence base for sport	<p>Please see our updated guidance on planning for sport. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=planning_for_sport_guidance</p> <p>I am aware that Richmond developed and adopted a Playing Pitch Strategy in 2015. While this is considered to be a robust evidence base for sport, it is important that it is kept up to date. I am aware that Richmond is considering updating this document in due course and would be very supportive of this.</p> <p>Uniting the Movement Our new Strategy ‘Uniting The Movement’ is a 10-year vision to transform lives and communities through sport and physical activity. We believe sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all. We will be a catalyst for change and join forces on issues which includes connecting communities, connecting with Health and Wellbeing and Active Environments. The new strategy can be downloaded from our website here The strategy seeks to;</p> <p><u>Connect Communities</u> We want more communities to enjoy the benefits of what sport and physical activity can do, both for individuals and the place where they live and work. Those benefits will come from a more bottom-up approach, working with – not doing things to – communities, and helping those affected to play a role in what happens in their neighbourhood and how it gets done. Active communities can be a powerful tool in building great places to live. <u>Connect with Health and Wellbeing.</u> We know that there are many organisations working to improve health and wellbeing, from the NHS to those in the voluntary and community sector, local authorities, employers and the commercial health and wellbeing sector. The strategy creates a potential to improve existing connections and explore new areas to help strengthen people’s health and wellbeing, from childhood right through to older age.</p> <p>Active Environments Sport England considers that the planning system plays a vital role in shaping our built environment and that can play a big part in the movement of people and getting people active. Modern-day life can make us inactive, and about a third of adults in England don’t do the recommended amount of weekly exercise, but the design of where we live and work can play a vital role in keeping us active. I note that Lewisham has committed to promoting inclusive and liveable neighbourhoods; helping people to move and be active is considered to be a large part of this. I also note that a design-led approach is promoted. We want to make the choice to be active easier and more appealing for everyone, whether that’s how we choose to move around our local neighbourhood or a dedicated facility for a sport or activity. As part of Sport England’s drive to create an active environment, we promote Active Design through all planning activity. Active Design is Sport England’s contribution to the wider debate on developing healthy communities. Active Design is rooted in Sport England’s aims and objectives to promote the role of sport and physical activity in creating healthy and sustainable communities. Active Design wraps together the planning and considerations that should be made when designing the places and spaces we live in. It’s about designing and adapting where we live to encourage activity in our everyday lives, making the active choice the easy choice. Sport England has produced design guidance on ‘Active Design’ that can be downloaded from the website here. As noted above, the aspirations of the Local Plan appear very much in line with Active Design principles and Sport England would welcome a reference to its Active Design guidance within this document..</p>
Laura Hutson, Sport England	Policy 37. Public open space, play, sport and recreation	I note that policy 37 has additional text worded to be in line with the London Plan and the NPPF to make the protection for sport and recreation facilities clear. Sport England is fully supportive of this as it provides a good level of protection for playing fields and sports facilities. I note that there in a requirement for early engagement with Sport England for development affecting playing field and this is welcomed. Sport England also welcomes the aspiration to secure community use agreements in order to ensure that private sports facilities meet the wider needs of the community.
Laura Hutson, Sport England	General in relation to future site allocations	<p>With regard to any future site allocations, we would advise that the allocation of sites for sports facilities should be identified through the use of a robust and up to date evidence base such as the Richmond Playing Pitch Strategy. The NPPF states that it is important to ensure that the right facilities are in the right place. It is also essential that where sites adjacent to playing fields are proposed to be redeveloped that the new use does not prejudice the use of the playing field (for example, due to ball strike.</p> <p>I note that Richmond Local Plan aspires to have open space delivered as part of housing developments in Policy 37 and this is mentioned in several site allocations. Sport England would request that, particularly in the case of major developments, the evidence base for sport is used to determine whether the provision of sports facilities on site may also be appropriate.</p>
Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 37. Public open space, play, sport and recreation	<p>FORCE is strongly in favour of investing to improve underutilised open spaces for public and environmental benefit, rather than taking their underutilisation as a cue to build on them. We also support improvement to those spaces which are at risk of excessive wear-and-tear from new residential developments. At a basic level, the frequency with which litterbins are emptied needs to be increased, especially after weekends, where footfall has increased. Where play space is provided within the curtilage of private developments, we support the “expectation for play spaces to be made publicly accessible.” (21.29) It is important that on-site facilities are adequately maintained.</p> <p>We have found that parts of the Council are reluctant to take on the responsibility for new green and open spaces when these might be available as a planning gain or through the review of its own estate. We consider this to be a missed opportunity for significant public benefit and would note that the new Twickenham Junction Rough public space has provided a major public benefit to many local residents. As the population grows and the benefits of local open space are better understood, then the need for and value of new spaces becomes greater. We propose a specific policy in the Local Plan which encourages the Council to identify and take the opportunities for new public open spaces as part of discussions with landowners and in the review of its own land holdings.</p>
Tim Catchpole, Mortlake with East Sheen Society	Policy 37. Public open space, play, sport and recreation	No comment.
Nina Miles, GLA on behalf of Mayor of London	Policy 37. Public open space, play, sport and recreation	<p>We support the references to children and young people’s play facilities in policy 37 and are pleased to note the reference to the GLA’s child yield calculator, the LP2021 benchmark of 10 sqm per child and the Mayor’s Shaping Neighbourhoods: Play and Informal Recreation SPG. The supporting text in paragraph 21.27 sets clear criteria for the loss of facilities and perhaps should be embedded within the policy.</p> <p>Policy S4 LP2021 notes the importance of informal recreation and paragraph 5.4.2 highlights the current lack of opportunities for children to play in their local neighbourhood. A recognition of informal play as well as formal play spaces within Richmond’s policies would be welcome. This is also connected to the Healthy Streets Approach.</p>

Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 37 Public Open Space	Recommended Amendments and Explanation As currently drafted the policy isn't fully evidenced to be properly justified. However, the stated intention to prepare further evidence to update the Public Open Space deficiency maps should address this. We would welcome the opportunity to input into this evidence gathering work and reserve the opportunity to make further representations on the draft policy once this evidence is published.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 37. Public open space, play, sport and recreation	No change proposed.
Mark Jopling, Udney Park Playing Fields Trust	Udney Park Playing Fields	In 21.28 we note that the Playing Pitch Strategy will be updated in 2022. It is essential that Udney Park retains the status granted in the current Local Plan as a "strategic site" in the provision of playing field capacity at this end of the Borough, many local sports clubs are limiting membership and playing homes games out of Borough, in LBRUT demand for playing fields exceeds supply so it essential that all playing field capacity, and potential playing field capacity, is protected irrespective of site ownership.
Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to culture)	We understand the Council expect to undertake a further Sports Review in 2022.
Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 37. Public open space, play, sport and recreation	No change proposed.
Alice Roberts, CPRE London	Paragraph 21.31 (in relation to public open space)	<u>21.31 seeks to improve the provision of public open space.</u> We therefore suggest that the area of land at Heathfield Recreation Ground, which was proposed for a site for a school should be added back in and given protected status. More needs to be done to turn 'grey space' (roads and space given to parking) to green space or community open space.
Jon Rowles	Paragraph 21.31	21.31 seeks to improve the provision of public open space. A portion of Heathfield Recreation Ground was taken out of the POS designation to allow for the redevelopment of Heathfield School and to provide a secondary school in the early 2000s. Now that this development is not going ahead I feel that the POS removal should be reversed and that the new Heathfield Recreation Ground extension should have POS designation applied to it.
Alice Roberts, CPRE London	General Comment (in relation to creating new parks)	However, we believe the Council could demonstrate greater ambition for increasing the amount of green space in Richmond. For example, new parks could be created in areas of the borough with not enough green space by converting 'grey space' into 'streetparks'.
Philip Briggs, Richmond Bat Species Action Plan Steering Group	p.252, paragraph 21.32	"...Regardless of the type of open space provision, it should be designed with nature conservation and biodiversity benefits in mind, thereby delivering biodiversity net gain and addressing the requirements of Policy 39 of this plan." It's really good to see this. Please could something be added about the importance of avoiding artificial lighting in order to provide dark corridors?
	Policy 38. Urban Greening	
Katy Wiseman, National Trust	Policy 38. Urban Greening	The National Trust supports Policy 38 Urban Greening which requires all development proposals to integrate green infrastructure into their development. In recent times it has become clear that urban greenspace and nature has a proven impact on people's physical health and wellbeing. Biodiverse and attractive green space is important for the wellbeing of local people as well as providing environmental benefits such as urban cooling, flood mitigation and improved air quality. The National Trust recently commissioned a review of urban greenspace across the UK which showed a huge surge in people's use of green spaces during the pandemic and revealed inequality of access to nature in many urban neighbourhoods . The research undertaken by Vivid Economics makes a strong economic case for significant investment across to the UK for introducing green spaces into some of the greyest urban communities over the next five year, and the National Trust and partners are lobbying government to make a commitment to fund urban green infrastructure to level up access to green space as part of the governments 'infrastructure revolution'. Although the research focuses on funding more strategic green infrastructure such as greening urban streets, upgrading poor quality parks, creating large recreational parks and forests, the Trust recognises that most of the new development in the Richmond Borough will be small and cumulatively they can have a significant impact on greening the Borough to be benefit of people and nature. We support policy criterion D. which requires the greening elements to focus on tackling the climate emergency and/or help avoid or mitigate the impacts of the proposed development on biodiversity and welcome policy wording that refers to the need for locally relevant greening as this will add to the identity and connect to the local area, as well as increase opportunities to complement the site's existing wildlife value. http://www.bartonwillmore.co.uk/BartonWillmore/media/Main/news/news/2020/Greenkeeper/Greenkeeper-Report-for-FPA-Greening-Programme-July-2020-2.pdf
Jon Rowles	Policy 38. Urban Greening	Only 'major' developments need to do calculations – the requirement should prob be moved down the scale to something like 5 units or over. All sites should contribute to the greening of streets or local areas they are located in. Such as contributing to tarmac being removed and green verges put in tree planting or improvements to local parks. Most developers want to install a modular shallow green roof with sedum, so could be tightened up and made clearer what is needed; biodiverse green roofs. Hard to change at the last minute (that is the excuse often given) a good green roof is quite heavy and needs more steelwork in the roof to hold it up. Current design guidance for roof design for houses favours pitches roofs so this may need to be altered so that more green roofs can be constructed – maybe false pitch at the front to conserve roofscape at the front, but flat roof behind and this will also reduce water runoff rates.
Tim Catchpole, Mortlake with East Sheen Society	Policy 38. Urban Greening	No comment.
Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 38 Urban Greening	Recommended Amendments and Explanation We recommend the following amendments to Part E of the policy 'Extensive green or brown roofs should be incorporated into developments with roof plate areas of 100sqm or more, where technically feasible. As much as reasonably possible of any potential roof plate area should be used as biodiversity-based extensive green or brown roof.' We support the ambition of the policy however, there is no evidence to properly justify the 70% requirement which in practice would limit space needed for residential rooftop amenity, space for plant/services and maintenance, and is therefore likely to be too restrictive. The recommended amendments would ensure that the policy was capable of being effective .
	Policy 39. Biodiversity and Geodiversity	
K Peachey	21 Increasing biodiversity and the quality of our green and blue spaces, and greening the borough	Para 21: I fully support increasing biodiversity and greening the borough and I am delighted to see the initiatives in the local plan to support this.

		<p>Building on greenfield sites tends to offer the most profit and therefore are more attractive to developers. Trees, hedgerows, wildlife are more likely to be cleared around the time of a land sale with the resulting destruction of complex mature habitats. Tenants on the site may also be unaware of actions which undermine the local ecosystems. As now with carbon chains, I think there needs to be more lifecycle responsibility for green sites, so that initiatives to retain and enhance biodiversity are monitored beyond the initial approved development plan.</p> <p>The Council appears to have very limited powers in preventing destruction of existing habitats outside of planning submissions, even in designated green space and often only becomes aware of habitat destruction when it is too late.</p> <p>Developers demonstrating an environmental conscience should be welcomed and responsibility should be with site owners to provide evidence that their ongoing maintenance plans will and do encourage different plant or animal species. They should budget to demonstrate what impact the development has had on existing species and their populations during and after the development, in order to improve future planning decisions. This will be a more positive approach than trying to prove a development will not impact existing diversity.</p> <p>Green roofs and walls should be viewed as additional measures to support biodiversity rather than replacements for existing biodiversity in developments. New habitats are not usually a valid replacement for mature complex habitats both above and below ground.</p> <p>Additionally, local opposition to measures which may have a deleterious impact on biodiversity are less likely to succeed in areas where there is little finance to hire experienced planning barristers, such as used by experienced development companies. I would welcome any funding to be provided by development companies to ensure adequate representation of local opposition (similar in the way party wall agreements and disputes are funded by the property owner wishing to build on the party wall).</p>
K Peachey	Para 21: Policy 39 B3	Policy 39 B 3: Delivering offsite biodiversity value is likely to favour profit over biodiversity since it will be difficult to predict the impact on other ecosystems connected to the existing site. I therefore propose this is removed as an option.
Katarina Hagstrom	Policy 39: Biodiversity and Geodiversity – Part B	<p>Context:</p> <p>(1) This paragraph clarifies that protection of species and habitats extends beyond designated sites. This principle is in line with the objective to Protect Biodiversity; and should be maintained.</p> <p>(2) The paragraph clarifies that, for important sites, the most significant ecological features should be protected and the impact of development minimised. These principles are appropriate – but ONLY if harm cannot be avoided.</p> <p>(3) The source of the wording used in Policy 39 part B of the Draft Plan would appear to be the London Plan 2021, policy G6, point C. However, the London Plan provides <u>specific context</u> for this wording:</p> <p>A “<i>Sites of Importance for Nature Conservation (SINCs) should be protected.</i>”</p> <p>C “<i>Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should apply to minimise development impacts: ...</i>” (emphasis added)</p> <p>Concerns:</p> <p>(a) Policy 39 part B (from “development proposals shall...”): appears to apply lesser obligations on Protecting Biodiversity than National and London Policy and guidance*.</p> <p>(b) The Policy 39 part B wording of the points 1-3 (mitigation hierarchy principles): appear to narrow the application of the mitigation hierarchy versus its application elsewhere in planning guidance**.</p> <p>(c) The Policy (from “development proposals shall...” – as currently worded – appears to be inconsistent with the Objectives and Principles of the Draft Local Plan itself. Ecology – and protecting biodiversity – depends on complex integrated systems, requiring the protection of whole ecosystems and ecological networks. An apparently ‘less significant’ feature may nevertheless play a vital role in the sustainability of the ecosystem - and the viability of the species within it.</p> <p>Suggestions:</p> <p>(i) Maintain the explicit application of this guidance beyond ‘designated’ SINC sites. This is appropriate as the obligation to Protect Biodiversity applies even if a site has not been designated.</p> <p>(ii) Make explicit the requirement to, firstly, and wherever possible, Avoid Harm. I.e. clear context – as per the London Plan 2021, policy G6 A and C – should be added.</p> <p>(iii) Even with clear contextual clarification on the mitigation hierarchy as defined here, NPPF 2021 180** must still be fully taken into account. I cannot assess whether this specifically needs to be noted in the Draft Local Plan.</p> <p>It might, however, be helpful to provide explicit clarity on the requirement for <u>adequate</u> mitigation / compensation (ie to avoid the impact of the specific harm caused) <u>without which planning permission should be refused</u>.</p> <p>Specifically, adequate mitigation(/ compensation) is not the same thing as simply achieving Biodiversity Net Gain: “<i>Biodiversity net gain complements and works with the biodiversity mitigation hierarchy set out in NPPF.... It does not override the protection for designated sites, protected or priority species and irreplaceable or priority habitats set out in the NPPF. Local planning authorities need to ensure that habitat improvement will be a genuine additional benefit, and go further than measures already required to implement a compensation strategy.</i>” (Ref: Natural Environment guidance, Paragraph: 024 Reference ID: 8-024-20190721, Revision date: 21 07 2019)</p> <p>Footnotes:</p> <p>*NPPF 2021 #174, #175, #179, #180, NE & DEFRA ‘Protected Species and Development’ Guidance (2022), and Dept & Ministry for Levelling Up, Housing and Communities ‘Natural Environment’ Guidance (2019).</p> <p>**NPPF 2021 180: “<i>When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), <u>adequately</u> mitigated, or, as a last resort, compensated for, <u>then planning permission should be refused</u>;</i>” (emphasis added).</p>
Theresa Oddelm, The Royal Parks	Policy 39 Biodiversity and Geodiversity	We welcome this policy given the SSSI designation of both Richmond and Bushy Parks and the National Nature Reserve and SAC designation of Richmond Park.
Theresa Oddelm, The Royal Parks	Policy 39 Biodiversity and Geodiversity– comments specific to biodiversity and the Royal Parks’ Environmental Designations	We welcome this policy and the protection and opportunities it offers for enhancement of designated sites and green corridors. Comments regarding proposed SINC extensions are provided further below.[See Comment under Appendix 4]
Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 39. Biodiversity and geodiversity; and Appendix 4	<p>We welcome LBRuT’s commitment “to protect and enhance the borough’s biodiversity and geodiversity,” including its commitment to “protecting ecological or wildlife corridors from development which may destroy, impair or harm the integrity of the corridor”. We particularly favour an approach that starts by recognising the biodiversity potential of a site rather than its current biodiversity status as the relevant baseline from which to evaluate genuine biodiversity net gain, and trust that this approach will inform the upcoming biodiversity net gain SPD.</p> <p>[See comment in relation to site specific SINCs]</p> <p>We trust that the new SINCs will be implemented whether or not the borough’s population continues to increase as forecast. The new SINCs will make an important contribution to countering the Climate Emergency and improving the physical and mental health of the existing resident base.</p>

Tim Catchpole, Mortlake with East Sheen Society	Policy 39. Biodiversity and Geodiversity	There is very little mention here of geodiversity. There is a proposal to include the landforms and Pleistocene deposits of Richmond Park into a new Geodiversity area. In the annals of The Geological Society of London, a lecture titled The Thames Through Time, a Burlington House lecture, held at the Geological Society on 20 September 2011, it is reported: “the river has laid down a stacked ‘staircase’ of terrace sediments that form one of the most important archives of Pleistocene environmental change anywhere in the world.”
Ziyad Thomas, Planning Issues Ltd on behalf of Churchill Retirement Living and McCarthy Stone	Policy 39. Biodiversity and Geodiversity	The Council’s commitment towards new development towards Biodiversity Net Gain. The requirement for 20% Biodiversity Net Gain goes beyond the requirements in Government legislation or the policies of the London Plan (Policy G6 Biodiversity and access to nature) We note that the Regulation Consultation has not included a Whole Plan Viability Assessment as part of the published evidence base. We would respectfully remind the Council that the PPG states that “The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan” (Paragraph: 002 Reference ID: 10-002-20190509). The cost of biodiversity net gain must be robustly allowed for in the forthcoming Local Plan Viability Assessment. Presently the policy is not ‘justified’ by a proportionate level of evidence and the proposed policy is unsound as a consequence.
Michael Atkins, Port of London Authority (PLA)	Policy 39. Biodiversity and Geodiversity	Welcome reference in part A4 to the need for development to deliver robust and measurable net gains for biodiversity by incorporating and/or creating new habitats or biodiversity features, and part 5 which requires development proposals to provide at least a minimum of 20% contribution towards delivering measurable Biodiversity Net Gain (BNG). As part of this it should be noted as part of the policy that net gains in biodiveristy can also be achieved in and alongside riverside areas as well on land. Noted in supporting text 21.79 that the Council will produce further planning guidance in the form of a SPD on biodiversity, specifically on biodiversity net gain, and set out for applicants and developers how biodiversity net gain can be delivered on a variety of sites, ranging from major to small-scale proposals. The PLA requests to be consulted on the proposed SPD when available. Necessary changes: Policy 39 should include the following amendment to part A4 "requiring development to deliver robust and measurable net gains for biodiversity by incorporating and/or creating new habitats or biodiversity features, such as expansion and improvement of habitats, green 'and blue' links or habitat restoration, incorporation of green roofs and walls, tree planting as well as micro-habitat features such as bird and bat bricks and boxes, hedgehog gates or wildlife ponds in line with other policies of this Plan"
Katy Wiseman, National Trust	Policy 39 Biodiversity and Geodiversity	The Trust supports proposed Policy 39 which seeks to protect and enhance the borough’s biodiversity and geodiversity. Everything must be done to prevent the decline in biodiversity currently being experienced across the Earth due to human activity such as land-use change, pollution, over consumption of natural resources and climate change. The National Trust is committed to creating 25,000 hectares of new wildlife habitats by 2025 which will provide more opportunities for nature and people to connect to nature. The Trust also recognises that it is important that we act and multiple small and local actions that enhance and improve biodiversity add-up. We support criterion A5 which requires development proposals to provide at least a minimum of 20% contribution towards delivering measurable Biodiversity Net Gain (BNG) and appreciate that this target is one of the more ambitious currently set within the Region. We also support criterion C which positively supports proposals that will reduce deficiencies in access to nature and green space. This policy aligns with our values and paragraph 174 of the NPPF.
Anna Stott, WSP on behalf of Sainsbury’s	Policy 39. Biodiversity and Geodiversity, Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton	[See comment against Site Allocation 5 in relation to concerns the BNG requirement will be unfeasible]
George Goodby, Environment Agency	Policy 39. Biodiversity and Geodiversity – General comments in relation to biodiversity overview	We also welcome that Blue-Green Infrastructure, Biodiversity and Rivers are all covered in separate policy sections and that an ambitious policy to achieve 20% net gain on most types of new developments has been set. A third of the Borough’s land is designated as parkland or green open space and the policies set out in the plan recognise the importance of this to Richmond’s unique character.
George Goodby, Environment Agency	Policy 39: Biodiversity and Geodiversity.	[See comment for a link to green and blue infrastructure]
George Goodby, Environment Agency	Policy 39. Biodiversity and Geodiversity	[See comment on linking the climate and the biodiversity crises in policy.]
George Goodby, Environment Agency	Policy 39: Biodiversity and Geodiversity.	We are pleased to see the inclusion of an ambitious policy for 20% Biodiversity Net Gain (BNG). This will compliment and build on the requirements for BNG as set out in the Environment Bill, which recently received Royal Assent. Much of the secondary legislation and guidance for BNG is still under consultation before the requirement becomes mandatory in 2023. This includes expanding the metric to include consideration of marine (sub-tidal) biodiversity. Additionally, the details of which types of development will be included in the mandatory BNG requirements are also under consideration through a DEFRA consultation . We would recommend that this policy remains flexible so that it can be applied in conjunction with, and compliment, mandatory net gain requirements. We also note that householder development is included in the Policy’s requirement for 20% net gain. Consideration should be given as to whether the DEFRA metric 3.0 is appropriate for calculating this. Natural England have developed a Small Sites Metric which may be applicable. The policy should include a demonstration that the requirements are consistent and proportionate to the size of development proposals and any potential impact on biodiversity. In Point A of the policy, the biodiversity value of rivers should be acknowledged. These are some of the biggest assets in Richmond upon Thames in terms of biodiversity, and opportunities to enhance them should always be sought. Furthermore, the links between biodiversity, climate change, flood risk, and the Water Framework Directive should be made. We feel the clarity of Point A.5 would be improved if it was changed to ““provide a measurable 20% net gain for biodiversity, in line with the DEFRA metric 3.0 or latest available version”. This Policy should also include a requirement for developers to demonstrate how they have followed the mitigation hierarchy and demonstrate how they have followed BNG good practice principles. We would also refer you to CIEEM’s guide Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide . Box 4.1 of this document outlines best practice for biodiversity net gain policies. The rivers section of the DEFRA Biodiversity metric penalises encroachment within 10m of top of bank, so providing a 10m buffer zone would help sites with a riverine element to achieve 20% net gain. Throughout our response to the plan, we have requested 8m buffer zone from fluvial main rivers in line with our current internal guidance and our permitting regime requirements. However, if this was extended to 10m this would synergise well with the requirement for 20% BNG set out in this policy. We note that the Council intends to publish a Supplementary Planning Document which expands on Biodiversity Net Gain requirements and appreciate that some of our comments on this policy may be explored in more detail in this document. We would be happy to assist in the preparation of this SPD.
Louise Cole	Chapter 21: Increasing biodiversity and the quality of our green and blue spaces, and greening the borough Policy 39: Biodiversity and Geodiversity page 257/258, 260, Paragraph 21.66	2. protecting and conserving priority species and habitats that sit outside the nature conservation network of designated sites, including protecting other existing habitats and features of biodiversity value on non-designated sites and promoting opportunities for their enhancement by using the Richmond Biodiversity Action Plan’s aim and actions; 4. requiring development to deliver robust and measurable net gains for biodiversity by incorporating and/or creating new habitats or biodiversity features, such as expansion and improvement of habitats,' 21.66: All development, particularly for new and replacement buildings and extensions to buildings, should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows,

		<p>and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the National Planning Practice Guidance, these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications.'</p> <p>COMMENT</p> <p>I welcome these paragraphs for their requirement to provide integrated nest boxes, in accordance with the London Plan and NPPG Natural Environment 2019. In particular I welcome the encouragement for swift bricks as a universal nest brick which benefit a range of birds in addition to swifts.</p> <p>I request that there is a requirement for the nest boxes to be installed in accordance with best practice guidance (see below) with regard to recommended densities (1:1, swift bricks to residential units, and one swift brick per six square metres of facade on commercial buildings):</p> <p>The Chartered Institute of Ecology and Environmental Management Journal, Issue 104, June 2019: https://cieem.net/resource/the-swift-a-bird-you-need-to-help/</p>
Mike Priaulx, Swifts Local Network: Swifts & Planning Group	Policy 39. Biodiversity and Geodiversity, Paragraphs 21.66 and 21.70	<p>Paragraphs 21.66 & 21.70 (page 260) of draft Local Plan (main document).</p> <p>These paragraphs relating to swift bricks are a welcome implementation of the London Plan (2021) policy G6 item B4. The reference to universal nest bricks is also welcome, representing the latest guidance from NHBC Foundation and CIEEM etc.</p> <p>However, an important omission is that these should be implemented in accordance with best practice.</p> <p>RIBA and CIEEM and the imminent BS 42021 provide general guidance on location and recommend one nest brick per dwelling on average.</p> <p>Brighton & Hove Council for example actually go beyond this requirement, requiring swift nest boxes (to be integral bricks wherever practical) in all new developments that are five metres high or above; e.g. for smaller developments a minimum of three boxes, or two per residential dwelling, or one per 50sqm of commercial floor space, whichever is the greater (https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Swift%20Guidance.pdf - pages 2-3).</p> <p>Changes considered necessary:</p> <p>We request that "These features should be implemented in accordance with best practice guidance" is added to the end of paragraph 21.66.</p> <p>Please also add "at a ratio of one nest brick per dwelling on average." to the end of paragraph 21.66.</p> <p>This would reflect current guidance from RIBA (Designing for Biodiversity, 2013), and CIEEM (https://cieem.net/resource/the-swift-a-bird-you-need-to-help/), and the imminent British Standard BS 42021 due for issue on 07/02/22 (https://shop.bsigroup.com/products/bs-42021-integral-nest-boxes-design-and-installation-for-new-developments-specification/standard/preview) (https://standardsdevelopment.bsigroup.com/projects/2017-03102#/section).</p>
Katarina Hagstrom	Policy 39: Biodiversity and Geodiversity, Paragraph 21.67	<p>Context:</p> <p>The requirement to provide data to GiGL is already a requirement in the current Local Plan. However, it appears that this requirement is largely ignored by developers, despite its promotion as Good Practice (Ref: In Practice, Dec 2010, Where is all the data going?).</p> <p>Furthermore – as far as I understand – the Council has no means of enforcement on this.</p> <p>Suggestions:</p> <p>Inclusion of a specific requirement in this subsection (21.67) that ALL ecological data must be submitted to GiGL at the same time as any ecology survey is submitted – AND that any Planning Application cannot be accepted until this requirement has been fulfilled.</p> <p>This would be fully in line with CIEEM guidance (CIEEM Guidelines for Ecological Report Writing, Second Edition, Dec 2017, paragraph 5.34) which clarifies that the whole dataset should be made available on request.</p>
Vicky Phillips, Habitats & Heritage	Para 21.67	The Council needs to make it compulsory for developers to lodge with GiGL all data collected during ecological surveys. This should be enforced through planning conditions or in some other way.
Mike Priaulx, Swifts Local Network: Swifts & Planning Group	Policy 39. Biodiversity and Geodiversity, Paragraph 21.67	<p>Paragraphs 21.67 (page 260) of draft Local Plan (main document).</p> <p>This policy and paragraph is welcome but does not clearly consider the impact on buildings-based species of bats and birds.</p> <p>Changes considered necessary:</p> <p>We request that "including buildings-based species" is added to 21.67, i.e. "Where development proposals could affect or harm a European Protected Species or its habitat including buildings-based species..."</p>
Clare Snowdon	Paragraph 21.75 in relation to biodiversity net gain	21.75 It's important that biodiversity net gain includes a time factor - both in ensuring that displaced species are displaced to suitable nearby habitat and not eliminated (ie that this is not a "jam tomorrow" approach - reducing populations with the promise of later increasing them). Also that there is a requirement to demonstrate actual net gain over a period of several years, not purely an intention to create net gain, which fails due to poor implementation as seen with tree planting projects, where the trees fail to thrive or the "lip-service" placement of bat boxes
Philip Briggs, Richmond Bat Species Action Plan Steering Group	Comment in relation to areas of darkness	<p>We would request that there are some specific commitments to retaining and increasing areas of darkness in and around features with known/likely biodiversity value or which have the potential to act as nocturnal wildlife corridors should lighting be reduced or removed. Our recommendations would be to exclude the introduction of street lighting, waymarking lighting on key dark habitats primarily (but not limited to bats) in the following areas including restrictions of light pollution from developments adjacent to the following key nature reserves and habitats:</p> <p>Ham Lands Ham Avenues Ham Common Ham Common Woods Petersham Common Terrace Gardens Ham and Petersham towpath Kew towpath The Old Deer Park Barnes Common London Wetland Centre Richmond Park Bushy Park Barnes Towpath</p>

		Home Park Barge Walk (towpath Home Park) Marble Hill Park Corporation Ait Flower Pot Islands Petersham Meadows Petersham Lodge Woods The Copse Glover’s Island (Petersham Ait) If incorporated into the plan this could sit within the Biodiversity section or within the place-based strategies with the relevant sites listed for each place.
	<i>Note comments on site-specific designations in the Salix Ecology Review of Sites of Importance for Nature Conservation in Richmond upon Thames (November 2021) are included in this schedule under Appendix 4 which lists the Richmond SINCs and Candidate SINCs.</i>	
	Policy 40. Rivers and river corridors	
Hilary Pereira, River Thames Society	Policy 40. Rivers and river corridors	Policy 40 F indicates the Council is rightly proud of river-related industry. The last remaining working slipways, essential for the maintenance of larger craft including passenger boats, imminently risk being lost. Excessive rebuilding costs after a fire has a familiar ring, and the yards at Platts Eyot may struggle in an unfettered market. The remaining major slipways at EelPie island are now on the market, priced more to recognise the profit potential from housing than from a working boatyard. Only rigid planning controls can protect these yards and any compromises made on the rebuilding of Platts Eyot could be very significant for the river. This policy needs to be worded more strongly to protect these and other river-related uses, many of which would struggle to compete with alternative uses on strictly financial criteria: 2 years-worth of 'marketing' is likely to always come up with the answer the developer seeks. Those river-related uses should be for the benefit of the general public; other uses are so often for the privileged few, promoted by those that seek to make a short-term profit. In most riverside sites, no development is preferable to inappropriate development, and provides time for proposals for genuine river-related uses to get the necessary head of steam. Policy 47 on p284 on the use of the river for transport depends on the continuation of river infrastructure, which as well as working boatyards with slipways also means wharves and landing stages (Gauchos please note).
Hilary Pereira, River Thames Society	Policy 40. Rivers and river corridors, page 262	Ensure any riverside public access which is secured in the planning process is genuine and free for all at all hours, not conditional and limited at the discretion of the developer/riparian owner (policy 40, page 262). This prevents the creeping privatisation of what should be public space.
Heather Mathew, Richmond Council for Voluntary Service (CVS)	Page 19 (in relation to River Thames)	Pg 19 “Protect and improve the unique environment of the borough’s rivers especially the River Thames” The Thames does not start and finish in Richmond. The plan could think about the neighbouring boroughs’ development on the borough borders and ways of working cross borough to gain benefit along the length of the river that flows through it.
Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 40. Rivers and river corridors	This policy is presented largely with reference to the River Thames. We believe that many of the ambitions and protections proposed in (21.92) would be equally applicable to the River Crane. The Crane provides a continuous green seam through the west of the borough, including through more deprived areas, and therefore has scope to add more marginal value in terms of amenity and public health benefits. LBRuT as a major riparian owner should have more scope to influence development outcomes along the Crane corridor. We strongly welcome the explicit recognition in (21.89) that “Where appropriate, developments alongside and adjacent to the River Crane should contribute to the overarching aim of creating a metropolitan park that provides a continuous, accessible link between Hounslow Heath and the River Thames, incorporating river restoration works along the lower Crane, including a long distance footpath, improved access for surrounding communities and an enhanced wildlife / ecological corridor.” We also welcome the explicit linkage to site developments at “Greggs bakery, The Stoop, Twickenham Stadium, the Depot and Mereway Day Centre.” Where any other sites which currently have private frontage onto the River Crane come forward for development, we would like LBRuT to pursue a long-term strategy of securing free and unfettered public access to continuous stretches of the river, gradually eliminating breaks in the continuous access. Thus, we support the requirement that “all major development proposals adjacent to the borough's rivers should provide through-site links to the riverside to enable the public access to the riverside environment” (21.95) and would like this extended to the Crane and to all feasible sites, not just major sites. We would like public access to be available at all times of day and night, whilst protecting the river corridor from light and noise pollution. We strongly support the requirement for an 8-metre buffer zone.
Kevin Scott, Solve Planning Limited on behalf of Port Hampton Estates Limited	River-Related Uses	Policy 40 relates to the protection of rivers and river corridors in the Borough. This includes the protection of river-dependent and river-related uses and which will apply to Platt’s Eyot and future redevelopment proposals. <i>Policy 40. Rivers and river corridors</i> ... <i>Riverside uses, including river-dependent and river-related uses</i> <i>F. The Council will resist the loss of existing river-dependent and river-related uses that contribute to the special character of the River Thames, including river-related industry (B2) and locally important wharves, boat building sheds and boatyards and other riverside facilities such as slipways, docks, jetties, piers and stairs. This will be achieved by:</i> <i>1. resisting redevelopment of existing river-dependent or river-related industrial and business uses to non-river related employment uses or residential uses unless it can be demonstrated that no other river-dependent or river-related use is feasible or viable;</i> <i>2. ensuring development on sites along the river is functionally related to the river and includes river-dependent or river-related uses where possible, including gardens which are designed to integrate and enhance the river, and be sensitive to its ecology; Increasing biodiversity and the quality of our green and blue spaces, and greening the borough</i> <i>3. requiring an assessment of the effect of the proposed development on the operation of existing river-dependent uses or riverside gardens on the site and their associated facilities on- and off-site; or requiring an assessment of the potential of the site for river-dependent uses and facilities if there are none existing;</i> <i>4. ensuring that any proposed residential uses, where appropriate, along the river are compatible with the operation of the established river-related and river-dependent uses;</i> <i>5. requiring setting back development from river banks and existing flood defences along the River Thames</i> As with the employment policies, we generally support the provisions of this policy but we consider that it needs to address the situation where site specific conditions which may preclude meeting all or some of these objectives. Alternatively, this could be addressed in the site specific text and final policy for Platt’s Eyot.
Tim Catchpole, Mortlake with East Sheen Society	Policy 40. Rivers and river corridors	We are pleased to see reference made to the Thames Policy Area and to the special character of the reach set out in the Thames Landscape Strategy and Thames Strategy. The latter should read ‘Thames Strategy (Kew to Chelsea)’. We would be interested to know what the Local Plan has to say about the GLA’s Green Grid Study (2016) which showed the whole section of the River from Hampton Court to the Wandsworth border as ‘Arcadia’.

		<p>Para 21.84 should include the following: “These river valleys and the tributary streams and their valleys concentrate the groundwater hydraulic flow systems over large areas depending on the porosity and permeability of the soils and subsurface. Where they intersect particular aquifers can be a zone of particular sensitivity to pollution, flood risk, biota contamination and other effects. These intersection zones need careful mapping and control. Any building work, especially basements, that may puncture a sealed aquifer to allow groundwater ingress must be tightly controlled.”</p> <p>Para 21.87 about the network of linked waterways should include the following: “However, they also create barriers to movement and need expensive bridges and ferries to solve the problem.”</p>
Michael Atkins, Port of London Authority (PLA)	Policy 40. Rivers and river corridors	<p>Policy 40 is predominatly unchanged from current policy LP 18 which is in principle welcomed. In order to strenghten the policy further it is reccomended that the policy contains a specific reference to the need for development proposals adjacent to the riverside to consider appropriate suicide prevention measures, such as CCTV and appropriate fencing/edge protection and signage. This would be in line with the PLA's 'A safer riverside' guidance for development alongside and on the tidal Thames and the Tidal Thames Water Safety Forum (which includes the PLA, RNLI and emergency services.) Drowning Prevention Strategy (2019). Both documents are availble at to view at http://pla.co.uk/Safety/Water-Safety/Water-Safety. As background, in 2018, 30 people drowned in the river, accounting for 8% of drowning-related deaths nationally, and there were 688 recorded cases of people threatening to enter the Thames to take their life. The PLA therefore considers it vital for new development proposals to take the need for this infrastrucutre into consideration.</p> <p>Changes necessary: The following amendement is proposed to part D (access) of policy 40 "5. Consider the need to provide appropriate suicide prevention measures, such as edge protection and appropriatte signage in riverside areas.</p>
Jon Rowles	Policy 40. Rivers and river corridors	<p>Need to map covered rivers and seek redevelopment proposals to see that they are restored to a natural uncovered state. There are ones that run through the Fulwell bus garage, Kneller Hall, and Twickenham Stadium amongst others</p> <p>The council should explore the options to open up Longford River to more public access and have paths along the whole stretch between Hanworth Airpark and Bushy Park. Having a new walking route would improve locals physical and mental health.</p>
George Goodby, Environment Agency	Policy 40. Rivers and river corridors (in relation to flood risk)	<p>Similarly, Policy 40 Rivers and river corridors could promote the link between protecting and enhancing river corridors for design reasons as well as biodiversity and flood risk benefit. Part A could be updated to read ‘<i>The natural, historic and built environments of the Borough’s water courses will be protected. Development adjacent to the river corridors will be expected to contribute to improvements and enhancements to the river environment, including improved public spaces, access to the river and the Thames Path, the creation of new habitats, improvement of flood defences and flood storage</i>’.</p> <p>Recommended action: We recommend you update the wording in Policy 40 Part A to incorporate the multiple benefits that can be achieved along the development of river corridors.</p>
George Goodby, Environment Agency	Policy 40. Rivers and river corridors	<p>As discussed in our comments on the plan’s strategic objectives, all waterbodies in the borough are failing to achieve ‘good ecological status’ or ‘good ecological potential’ and therefore development needs to help address this. The policy should acknowledge the need to bring the waterbodies in the borough into good ecological status/potential in line with WFD requirements. We note that the requirement for a 16 metre set back for the tidal Thames and an 8 metre set back for other main rivers (including fluvial sections of the Thames) is included under Policy 8 Flood Risk and Sustainable Drainage, this requirement could equally sit under this policy. We note that Part F(e) of Policy 40 mentions set back requirements but does not give distance requirements – as a minimum this should be corrected so it is in line with Policy 8, or buffer zone requirements should be expanded to a subsection of Policy 40 in its own right, incorporating the requirements of Policy 8 part I (3).</p> <p>Undeveloped buffer zones between new developments and rivers are not only important in flood risk terms (as discussed in the “flood risk” section of our comments, but also have value:</p> <ul style="list-style-type: none">• Providing space for functioning riverine habitats.• Creating habitat connectivity along the river corridor.• Reducing the levels of diffuse pollution reaching the watercourse.• Providing space for natural geomorphological processes to occur. <p>Please see the suggested wording for buffer zone requirements falling under Policy 40:</p> <p>G: Undeveloped buffer zones and riverine biodiversity</p> <ol style="list-style-type: none">1. Unless exceptional circumstances are demonstrated for not doing so, development should be set back 16m from the landward side of Thames Tidal flood defences, and 8m from the top bank of all other main rivers (including fluvial sections of the Thames).2. Development proposals that include culverting and hard bank protection, including sheet piling, will not be permitted.3. Buffer zones should be planted with locally native species of UK genetic provenance and free from any formal landscaping, including gardens.4. To reduce light spill into the river corridor outside the buffer zone, all artificial lighting should be directional and focused with cowlings, in line with guidance for the reduction of intrusive light produced by the Institute of Lighting Professionals.5. Where watercourses have been historically modified adjacent to or within development sites, the watercourse should be restored to a natural state. This includes the de-culverting of watercourses, re-naturalisation of riverbanks and restoring the natural width/depth of a watercourse where it has been degraded.6. Where barriers to fish movement (e.g., weirs) are present in a watercourse adjacent to or within a development, the design should include the removal of that barrier, or where not feasible, measures to allow for the natural movement of fish within the watercourse. <p>We would welcome the production of a separate advice note on watercourses, like the River Wye Advice Note produced by Wycombe District Council.</p> <p>This advice note includes sections on the design of new riverside development (and the inclusion of buffer zones); landscape design of the riverbank; public access; surface water run-off and the avoidance of pollution and weirs/barriers to fish passage.</p>
George Goodby, Environment Agency		<p>[See comment regarding river buffer zone policy].</p>
Lucinda Robinson, Marine Management Organisation (MMO)	Paragraph 21.88	<p>[See comment for general points about marine planning and marine licensing]</p> <p>Further points to note</p> <p>Section 21.88 you refer to the South East Marine Plan here and its boundary up to MHWS, this means there is an overlap with terrestrial planning. The Local Plan could reference the marine and terrestrial planning overlap and the benefits of working with the MMO in aiding the success of the Local Plan. The local plan could also ensure the polices do not conflict with marine plan policies, this could be done through considering and referencing specific and relevant marine plan policies within the Local Plan policies.</p> <p>The East Inshore and East Offshore Marine Plans were adopted in 2014, and the South Inshore and Offshore Marine Plan was adopted in 2018, which cover the adjacent areas. Please ensure correct reference to the South East, South, and East marine plan areas where included.</p> <p>I believe your council did not attend a South East Marine Plan Implementation Training session in March 2021. This provided an introduction to marine planning, and I would suggest re-visiting the material in our recorded webinar which supported the Consultation of the South East Marine Plan. Please let me know if you have any questions regarding implementation of the marine plan.</p> <p>As previously stated, these are recommendations and we suggest that your own interpretation of the South East Marine Plan is completed. We would also recommend you consult the following references for further information:</p>

		South East Marine Plan and Explore Marine Plans .
John Waxman, Crane Valley Partnership	General in relation to river corridor enhancement and active travel	[See comment in relation to river corridors]
Mary Egan	River corridors	[See comment on Site Allocation 14 in relation to development adjacent to the river]
	Policy 41. Moorings and floating structures	
Louise Fluker, The Richmond Society	Riverside uses, including river-dependent and river-related uses p 265 paragraph 21.100	how will the Council deal with requests to use riverside structures for different purposes - e.g. landing stages becoming temporary restaurants or shared use? There is likely to be increasing pressure for greater commercial use extending further towards Petersham
Hilary Pereira, River Thames Society	Policy 41. Moorings and floating structures	Policy 41C includes important principles relating to the use of floating structures. In appropriate circumstances, the Council needs to follow through with enforcement action when the existing rules appear to be being flouted, and the use in practice fails to comply with that for which planning approval was granted. Some harsh words would be appropriate in relation to planning transgressions, most particularly for floating structures purported to be for the wider benefit for the community when this cannot be demonstrated. Floating but static businesses may make no contribution to business rates, and should not be granted a free ride at the cost of others.
Michael Atkins, Port of London Authority (PLA)	Policy 41. Moorings and floating structures	Policy 41 is predominatly unchanged from current policy LP 19 which is in principle supported. The proposed policy includes a requirement that replacement houseboats should not be materially larger than exisiting nor harm the character of the river, and the supportting text goes on to state that the Council has limited powers regarding the appearance of boats. It is therefore reccomended that further justification its required for the inclusion of this policy wording within the supporting text.
George Goodby, Environment Agency	Policy 41: Moorings and floating structures	Policy 41 Part A states that ‘there is a presumption against new proposals for houseboats...’. We would support this stance but recommend that it is updated to say ‘no new proposals for houseboats...’. This would strengthen the argument against any new or extensions to residential houseboats. We encourage you to revise the wording to more accurately reflect the outcomes you envisage. Recommended action: We recommend whether you strengthen the policy wording for Policy 41 Part A.
George Goodby, Environment Agency	Policy 41: Moorings and floating structures	[See comment under Policy 8 on multiple benefits and interconnected issues.]
George Goodby, Environment Agency	Policy 41: Moorings and Floating Structures	We are often consulted on applications for new and replacement moorings and floating structures on the River Thames. These invariably involve sheet piled bank protection methods and result in shading of the river. This compromises the objectives of the Water Framework Directive to achieve good ecological status/potential for waterbodies within the borough. This policy should discourage the use of hard engineering approaches to riverbank protection wherever possible.
Tim Catchpole, Mortlake with East Sheen Society	Policy 41. Moorings and floating structures	No comment.
Suzanne Parkes, Elmbridge Borough Council	Policy 41. Moorings and floating structures - River Thames development	In regard to Policy 41 ‘Moorings and floating structures’ where the LBR will resist new proposals for houseboats unless they are replacements, we would welcome sight of the evidence base that supports this policy. As mentioned at our meeting on 24 January 2022, EBC has recently assessed the housing needs of boat dwellers on the stretch of the River Thames in Elmbridge Borough. The Assessment found that there is a need for 10 additional moorings. This will inform our policy making and comply with requirements to assess boat dwellers needs set out in the National Planning Policy Framework (NPPF) 2021 and the Housing and Planning Act 2016. It is therefore, unclear at this stage how Policy 41 is justified.
	Policy 42. Trees, Woodland and Landscape	
Bridget Fox, on behalf of the Woodland Trust	Policy 42. Trees, Woodland and Landscape	<p>In general, we welcome this policy.</p> <p>We welcome the policy to protect ancient woodland and existing trees (B1-B4). We recommend strengthening the policy on ancient woodland (B2) to include appropriate buffers, and to make clear that this policy applies also to ancient and veteran trees outside woods as well as the full range of ancient woodland habitats, including historic parkland.</p> <p>We welcome the requirement to replace trees that are lost to development (B5). We recommend strengthening this with a requirement to replace trees on a greater than 1:1 basis, to increase the number of trees, and the tree canopy cover, in line with emerging requirements for Biodiversity Net Gain.</p> <p>We recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees.</p> <p>The Woodland Trust recommends a target for 30% canopy cover on development sites, to be achieved by a mixture of retention of existing trees supplemented by appropriate additional planting.</p> <p>We welcome the policy in support of appropriate native species (B6 and C3).</p> <p>We recommend strengthening this with a preference for UK & Ireland Sourced & Grown stock (UKISG) to support biodiversity and biosecurity.</p> <p>Changes consider necessary: We propose the following changes: B2 after "2. resist development that would result in the loss or deterioration of irreplaceable habitat such as ancient woodland" add "historic parkland or individual ancient or veteran trees. Where development is adjacent to ancient woodland, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice." B5 after "require, where practicable, an appropriate replacement for any tree that is felled" add "to achieve a net increase in tree cover, with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees." After "... (CAVAT);" add "with the goal of achieving an overall canopy cover target of 30%". B6 after "the use of native species as well as large-canopied species are encouraged where appropriate" add "as is the specification of UK & Ireland sourced and grown (UKISG) tree stock." C3 after "prioritising the use of appropriate native tree and shrub species" add "and the specification of UK & Ireland sourced and grown (UKISG) tree stock." Further information on these policy recommendations can be found in the Woodland Trust's publications: • Planners Manual for Ancient woodland https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/ • Residential developments and trees https://www.woodlandtrust.org.uk/publications/2019/01/residential-developments-and-trees/ • Tree strategies https://www.woodlandtrust.org.uk/publications/2016/07/local-authority-tree-strategies/ • Emergency tree plan https://www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan/</p>
Tim Catchpole, Mortlake with East Sheen Society	Policy 42. Trees, Woodland and Landscape	No comment.
Katarina Hagstrom	Policy 42. Trees, Woodland and Landscape	Comment:

		<p>There appears to be a gap in Planning Policy on the protection of Hedgerows – particularly those meeting the requirements to classify them as ‘UK BAP habitat’ or ‘important’ per Natural England guidance on hedgerows (2019). My understanding is that there is a grey area where such hedgerows are protected in a rural setting, but not in an urban setting, where it is assumed that hedgerows can be protected through planning policy.</p> <p>Given the importance of hedgerows in an urban setting for supporting Biodiversity, by providing habitat and commuting corridors, it would be helpful if they could be given more prominent and explicit protection within the Local Plan.</p> <p>Illustrative examples (alternative wording may be better):</p> <p>A. In accordance with London Plan (2021) Policy G7 (Trees and woodlands), the Council will require the protection of existing trees, [add: as well as the protection of important Hedgerows and other vegetation of landscape significance] and the provision of new trees, shrubs, hedgerows and other vegetation of landscape significance that complement existing, or create new, high quality green elements, which deliver air quality, climate change, amenity and biodiversity benefits.</p> <p>C. The Council will use Tree Preservation Orders (TPOs) or attach planning conditions to protect any trees considered to be of value to the townscape and amenity in order to secure their retention. [add: Planning conditions will also be used to protect important Hedgerows and other vegetation of landscape significance]</p> <p>etc. for other sections.</p>
	Policy 43. Floodlighting and other external artificial lighting	
Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 43. Floodlighting and other external artificial lighting	<p>We are concerned at the presumption that “Floodlighting...of sports pitches...will be permitted unless there is demonstrable harm to character, biodiversity or amenity and living conditions.” It can be very difficult to demonstrate harm, for example, where species have historically abandoned spaces because of development, and are deterred from re-colonisation because of invasive light. In these circumstances, it is more difficult to evaluate forgone biodiversity potential than viability impacts. We would in particular oppose the floodlighting of the College Field and Moor Mead Park in the River Crane corridor, and the lighting of any path along the River Crane or Duke of Northumberland’s River, including through Twickenham Junction Rough and Crane Park. We also consider that the Council needs to develop and adopt a policy that recognises and protects the value of dark corridors through the borough as important features for wildlife – particularly bats – as well as their value for appreciation of the night sky in an urban environment.</p>
Tim Catchpole, Mortlake with East Sheen Society	Policy 43. Floodlighting and other external artificial lighting	<p>No comment.</p>
Katy Wiseman, National Trust	Policy 43 Floodlighting and other external artificial lighting	<p>The National Trust supports proposed Policy 43 which seeks to eliminate harm to character, biodiversity or amenity and living conditions from light pollution and aligns with paragraph 185 of the NPPF which requires new development to take account of light pollution. We also welcome criterion D1. which includes historic integrity as a criterion to be considered when assessing floodlighting as light pollution can have a significant adverse impact on the historic integrity of historic building if poorly designed.</p>
Katarina Hagstrom	Policy 43 Floodlighting and other external artificial lighting – Part A and paragraphs 21.114, 21.115 and 21.118	<p>Context:</p> <p>Within a biological context, the body of evidence for artificial light causing harm is extensive. Within any natural environment: <i>“Given the effects of light on living organisms, it is plausible, and even <u>probable, that introduction of artificial light into the natural light regime will disturb the normal routines of many plants and animals</u>”</i> (Gov.uk: Royal Commission on Environmental Pollution’s 2009 report, Artificial light in the environment, paragraph 4.4). (emphasis added).</p> <p>Disturbance of nature often causes harm. Even where individual species may appear to show ‘light tolerance’, or artificial light appears to bring benefits, upon review this is often found to be accompanied by harm in the form of increased risk /reduced fitness / changes in relative competitive dynamics between species / fundamental changes within the ecosystem (eg. foodchains). etc.</p> <p>Current Ecological Impact Assessment guidelines (CIEEM 2019) are clear that a precautionary approach to evaluation must be applied: <i>“In cases of reasonable doubt, <u>where it is not possible to robustly justify a conclusion of no significant effect, a significant effect should be assumed.</u>”</i> (CIEEM, Guidelines for Ecological Impact Assessment in the UK and Ireland, v1.1, updated Sep 2019, 5.35). (emphasis added).</p> <p>In line with the above, where artificial light may impact on Biodiversity, it is thus appropriate to assume a significant effect, unless it is possible to robustly justify a conclusion of no significant effect.</p> <p>Furthermore, National Planning Policy (NPPF 2021) includes no presumption in favour of Floodlighting or External Artificial Lighting. However, NPPF 2021 #185 does require that <i>“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: ... c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”</i></p> <p>Issues:</p> <p>The current wording of Policy 43A, 21.114, 21.115 and 21.118 on floodlighting and external artificial lighting do not appear to meet the standard that it is appropriate to apply – ie that it is appropriate to assume a significant effect (of artificial light on biodiversity), unless it is possible to robustly justify a conclusion of no significant effect.</p> <p>Furthermore, it appears to place the burden of proof on the Council, stretching the Council’s limited resources, rather than requiring the developer to <i>“[submit] enough information for [the Council] to <u>fully consider the effect on on protected species and their habitats</u>”</i> (emphasis added) – which is required under Planning Guidance (NE and DEFRA, Protected species and development: advice for local planning authorities).</p> <p>Furthermore, any form of presumption in favour of External Artificial Lighting is contrary to current trends in increased understanding of how artificial light harms Biodiversity and efforts to maintain Dark Corridors and decrease harmful light pollution (eg. removal of floodlighting in Bushy Park).</p> <p>Suggestion:</p> <p>It is suggested that the wording be altered to <u>apply a precautionary approach to the impact assessment of Artifical External Lighting / Floodlights</u>, particularly with respect to the consideration of any Biodiversity impact.</p> <p>For example:</p> <p>A. Floodlighting, including alterations and extensions, of sports pitches, courts and historic and other architectural features will be permitted [remove: unless there is demonstrable][replace with: where it can be demonstrated that there will not be significant] harm to character, biodiversity or amenity and living conditions</p> <p>21.114 Floodlighting can enable the full use of outdoor sport and leisure facilities, but [add: significant] consideration must be given to any [remove: demonstrable][add: likely] harm to biodiversity, amenity and local character.</p> <p>21.115 [Add: Where it can be demonstrated that there will not be significant harm to character, biodiversity or amenity and living conditions], External lighting for sports, security or other purposes, should be installed so that the intensity and direction of light does not cause any demonstrable harm.</p> <p>21.118 It is important that floodlights are designed to be as unobtrusive as possible when unlit, in terms of number, height, width, design, colour and siting. Light pollution [remove: should be minimised to protect][add: must be maintained below a level at which there is likely to cause harm to] biodiversity as well as...</p>

Katarina Hagstrom	Policy 43. Floodlighting and other external artificial lighting - Part E	<p>Comment:</p> <p>Whereas favourable consideration of improvement of existing lighting installations is appropriate, it should be made explicit that the appropriate ‘baseline’ against which any floodlighting or external artificial lighting proposal will be assessed against will exclude:</p> <ul style="list-style-type: none">- any temporary or mobile light installation;- any light installation that has not been granted planning permission;- any legacy light installations which have been out of use for any period of time;- any significant increase in use in the recent past, above the long-term baseline; etc. <p>Without such a condition, policy 43 E can be abused, and temporary artificial light installations can be used as a simple means to get around the Policies in place to Protect Biodiversity. Planning guidance (Gov.uk, Natural Environment guidance; key issues in implementing policy to protect and enhance the natural environment, July 2019) provides guidance on a similar issue - ie the baseline to be used for Biodiversity Net Gain assessments: where deliberate harm to the site’s biodiversity value has taken place, this can be discounted in assessing the underlying value of the site.</p>
Vicky Phillips, Habitats & Heritage	Policy 43. Floodlighting and other external artificial lighting	as currently worded this policy is not adequate to protect biodiversity. We suggest rewording para A to read “floodlighting will not be permitted unless it can be demonstrated that there will be no harm to character, biodiversity etc.” meaning that the onus is on the developer to carry out a full assessment. Para E is also open to abuse as it is not clear how long the lighting which is being replaced needs to have been in use and whether a lapse of time during which it is not used means that this para can be discounted.
George Goodby, Environment Agency	Policy 43. Floodlighting and Other External Artificial Lighting	<p>Rivers and river corridors should be free from direct lighting, to minimise the impact on nocturnal animals such as bats that use tree-lined river corridors to commute along and for foraging. To reduce light spill into the river corridor, all artificial lighting should be directional and focused with cowlings. For more information see the Institution of Lighting Professionals guidance: https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/.</p> <p>Where floodlighting is likely to result in light spill into the river corridor, a luminaire schedule should be submitted. Furthermore, a bat survey should be carried out along the part of the river impacted by the light spill by a suitability experienced ecologist.</p>
Simon Tompsett, Richmond & Twickenham Friends of the Earth	P269 Policy 43. Floodlighting and other external artificial lighting	- the emphasis seems to be the wrong way round. Floodlighting should not be permitted unless it can be shown that there would be no harm to biodiversity. This is important as light pollution can seriously disrupt night-flying insects and bats.
Philip Briggs, Richmond Bat Species Action Plan Steering Group	p.269 Policy 43. Floodlighting and other external artificial lighting	<p>“A. Floodlighting, including alterations and extensions, of sports pitches, courts and historic and other architectural features will be permitted unless there is demonstrable harm to character, biodiversity or amenity and living conditions.”</p> <p>This feels weighted in favour of floodlighting that is often far from essential. Harm may be very real without always being easily demonstrable. Please could there be something about the applicant needing to satisfy the planning officer that there is an actual need for lighting? Forcing the applicant to reflect on this might even nip some applications in the bud where the applicants find themselves hard pressed to really justify the need.</p>
Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 43. Floodlighting and other external artificial lighting	No change proposed.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 43. Floodlighting and other external artificial lighting	No change proposed.
Laura Hutson, Sport England	Policy 43. Floodlighting and other external artificial lighting	<p>Sport England welcomes a policy that considers the positive benefits of sports lighting, which can enable the community to benefit from facilities year-round. Newer forms of LED sports lighting are generally less problematic in terms of light spill and the impact on the surrounding environment.</p> <p>Such lighting can also be automatically controlled in terms of timing if necessary. The reference to Sport England’s own guidance on Artificial Sports Lighting is welcomed.</p>
	Improving design, delivering beautiful buildings and high-quality places	
	Policy 44. Design Process	
Tim Catchpole, Mortlake with East Sheen Society	Policy 44. Design Process	<p>This new policy covers the optimizing of site capacity through the design-led approach, the content of the Design and Access Statement, the pre-app advice, design review panels, design codes, etc. This has come to replace the density matrix which has been used in all London Plans until now.</p> <p>There seem to be two issues here: optimizing capacity and efficient use of land through a design-led approach, and the quality of design itself. A design-led approach to good place-making should address function and aesthetics, and the latter is inevitably subjective, though clearly underpinned by policy and guidance, and by the Urban Design Study. It is good to see the Design Review Panel formally included as part of the process. This would sit better following Local Character and Design Quality.</p> <p>As mentioned above, we are not sure why this policy has appeared here at the end and not in the section on Local Character and Design Quality.</p>
Graeme Fraser-Watson, The Teddington Society (Planning Group)	Planning applications (Section 22 Improving design, delivering beautiful buildings and high-quality places)	<p>We fully support the desire to improve design and deliver beautiful buildings and high quality places, but section 22 seemed a bit light on details as to exactly how this would be achieved. It is not clear to us how proposed developments will be “judged” to determine whether they are beautiful or not. Beauty, after all, is somewhat subjective. How will it be measured ?</p> <p>The draft plan rightly encourages developers and applicants to submit high quality plans that demonstrate sensitivity to the surrounding area. Often, in our experience, planning applications are validated that do not provide sufficient information on which to judge an application especially as it relates to surrounding buildings and the street scene. Given modern CAD techniques, we believe it is not too much to insist that all applications that potentially affect the street scene include before and after street scenes of the proposed development and its surrounding properties, and perhaps also three dimensional representations. It would be good if the local plan clearly said that the council would not validate those applications which do not provide sufficient information to judge the impact of the requested development on the surrounding area. Could this requirement be mandated within the local plan ?.</p>
Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 44. Design Process	The wording of Part B of the Policy needs to be amended to omit reference to ‘the design guidance for the relevant character area as specified within the Urban Design Study 2021’ insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in ‘F. Richmond and Richmond Hill’ (on page 255).
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported	Policy 44. Design Process	The wording of Part B of the Policy needs to be amended to omit reference to ‘the design guidance for the relevant character area as specified within the Urban Design Study 2021’ insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in ‘F. Richmond and Richmond Hill’ (on page 255).

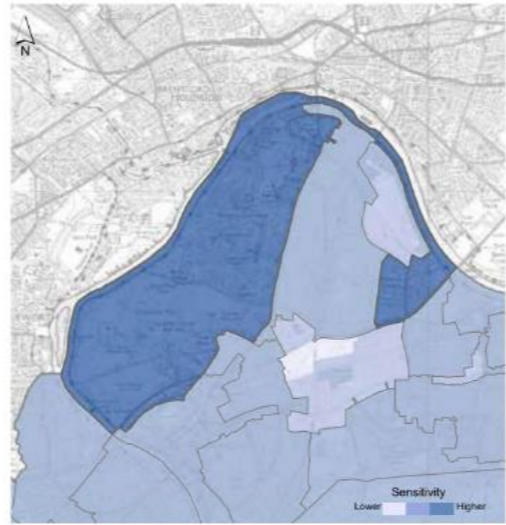
by the Friends of Richmond Green)		
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 44. Design Process	[See comment in relation to design coding and healthy places]
	Policy 45. Tall and Mid-Rise Building Zones	
Fiona McDaniel, McDaniel Woolf	Policy 45. Tall and Mid-Rise Building Zones, Paragraph 22.9	Pre-application C. It is recommended that all planning applications receive pre-application advice prior to submitting an application. How is this possible? Pre-applications do not have any timeframe for assessment, so especially for smaller projects and householder developments, a pre-applications can be extremely time wasteful and frustrating for all parties. It is quicker to simply submit a formal application, which is determined within 8 weeks and to use the feedback in the officer report for any subsequent application should there be a refusal. Also, the outcome of a pre-app is guidance only, and can be overturned at formal application. The previous duty planning officer system was a much better way of getting feedback. It was instant, it avoided the long and protracted need to write a report, the majority of the content of which was simply regurgitated policy anyway. Please can you reconsider reintroducing a duty planning officer meeting, potentially only for agents if it is impossible to open it up for everyone.
Theresa Oddelm, The Royal Parks	Policy. 45 Tall and Mid-Rise Building Zones	Tall buildings around the Parks can have a significant adverse impact on their character. We welcome the inclusion of the protection of views and vistas towards heritage assets across the Borough as well as the protection of parks and would like to work with the Borough to specifically help protect the views from Richmond and Bushy Park.
Alice Shackleton, on behalf of The Kew Society	Policy 45 Tall and Mid Rise Buildings	D : (mid-rise buildings may be permitted outside areas ear-marked for them) : this is concerning. Once developments such as Homebase are built then proposals in the vicinity and along the A316 will use that to argue for compliance with the requirements of C.
Katie Parsons, Historic England	Policy 45 Tall and Mid-Rise Building Zones	Generally, we support this policy which is clear, comprehensive, and detailed. It reflects policy D9 of the London Plan and provides appropriate criteria to positively manage the conservation of the historic environment and consideration of local character. The definition for tall buildings is based on the findings from the Urban Design Study and seems appropriate for the prevailing nature of the borough. We also support the hierarchal approach that the plan adopts when it comes to increasing densities. The distinction between tall and mid-rise is positive and reinforces the London Plan’s position which is that higher densities can be delivered through mid-rise development as a design and character-led alternative to to tall buildings. We do have some minor comments on where the policy could be improved: <ul style="list-style-type: none">• The policy requires development to “respect” vistas and views. This term however could be somewhat ambiguous, we advise that “avoids harm to” would be more effective.• The areas identified as appropriate on the maps in Appendix 3 are helpful, but the areas identified by way of “bubbles” and have imprecise boundaries which could cause confusion. The areas indicated also appear to have colour gradients, presumably showing where maximum heights should be located with heights (still falling within the plan’s definition of “tall” are to step down. However, there is no key to indicate what the graded colour represented. Again, this could is ambiguous and may cause confusion. We recommend that appendix is amended to include a key or some explanatory text.
Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 45.Tall and Mid-Rise Building Zones	As with Policy 40, we would like to see the same criteria applied to the River Crane where appropriate as the draft Plan applies to Tall and Mid-Rise Building Near the River Thames Frontage. Appendix 3 shows that there are no Tall Building Zones within the Crane and DNR corridors, and that the only Mid-Rise Building Zone is The Stoop. We would oppose any further designations within the Crane and DNR corridors. Higher density development has disproportionate impacts on adjacent open spaces in terms of occupancy and wear-and-tear. We are committed to protecting the vistas in the Borough’s open spaces: much of the mental health benefit of open space derives from the sense of tranquillity and escape from urban pressures that the open space provides. This tranquillity and escape is compromised by the visual intrusion of structures, including residential housing blocks that are visible from the open spaces, particularly during the winter months of leaf-drop. FORCE also believes that any “view premium” should be a public benefit, available, through the absence of visual intrusion, to all users of the open space, rather than a private benefit accruing to the property developer through the premium pricing of housing units that enjoy open-space or river views. Any further intrusions would also run counter to the Council’s own Policy 31 on Views and Vistas.
Tim Catchpole, Mortlake with East Sheen Society	Policy 45.Tall and Mid-Rise Building Zones	We note the identification of tall building zones, a more detailed coverage of the visual impacts and spatial hierarchy; also mid-rise building zones both related to, and unrelated to, the tall building zones. Again, as mentioned above, we are not sure why this policy has appeared here at the end and not in the section on Local Character and Design Quality, as it does in the current Local Plan.
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 45	In relation to Policy 45 (Tall and mid-rise building zones) and accompanying Appendix 3, RBGK have a particular interest in those zones in proximity to Kew Gardens, including F1 (Richmond Station), F3 (North Sheen) and G3 (Kew Retail Park). Appendix 3 specifies an appropriate height of 7-8 storeys for these prospective developments. RBGK request further information and justification on how these heights have been decided and tested to date. RBGK is strongly against any development that would have an adverse impact on the WHS. Therefore, the height benchmark is particularly important. If it is necessary to specify a maximum height (at all), we suggest these should be based on theoretical visibility testing, to obtain a general understanding of the potential visibility from these sites. Further,RBGK request that the wording is amended to ensure that this is a “maximum height”, and only appropriate where fully justified through a tall building assessment; when demonstrated to not be out of character with the prevailing heights of the existing surroundings; and where there is no detrimental impact on the Outstanding Universal Value of the Kew WHS. RBGK support Part A(5) of this policy, and request that any future planning applications for these sites are supported by graphic 3D modelling, including Accurate Visual Representations, as well as lighting assessments to determine any impact on biodiversity, particularly during night-time hours. Finally, RBGK would ask that they are consulted on in relation to any future planning applications for these three sites.
Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	Policy 45.Tall and Mid-Rise Building Zones	Draft Policy 45 sets out the Boroughs definition for tall and mid-rise buildings in line with London Plan Policy D9: <i>"Buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be tall buildings. Buildings which do not trigger the definition of a tall building set out above, but are 5 storeys or over, or 15 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be mid-rise buildings."</i> As currently worded, Part A of this policy states: <i>"A. Proposals for tall buildings will only be appropriate in tall building zones identified on the Policies Map and in Appendix 3, where the development would not result in any adverse visual, functional, environmental or cumulative impacts, having regard to all criteria set out in the London Plan Policy D9".</i> The RFU support the objective to provide a positive approach to accommodate growth across the borough, enabling tall buildings and higher density development in 'appropriate locations'. As currently worded, Part A suggests that if a proposal for a tall building is not within a specified zone, it will not be appropriate. However, recent case law confirms that tall buildings can be acceptable outside specified zones, provided they meet Part C of Policy D9 (which requires development proposals address the visual, functional and environmental impacts). We therefore suggest the following revised wording: <i>"A. Proposals for tall buildings will only be appropriate in tall building zones identified on the Policies Map and in Appendix 3, and/or where the development would not result in any adverse visual, functional, environmental or cumulative impacts, having regard to all criteria set out in the London Plan Policy D9".</i>

		Further to the above, we consider that the portion of SA13 to the north of the Stadium, which is less sensitive in townscape terms should be included in the Appendix 3 Tall/Mid Rise Building zones. [See also comment on Design Objectives)
Katy Wiseman, National Trust	Policy 45 Tall and Mid-Rise Building Zone	<p>We support the principle of Policy 45 Tall and Mid-Rise Building Zones which seeks to limit tall to medium sized building heights to restricted zones which have been formulated through an evidence-based approach to plan-making. We therefore support criterion 7 within the Spatial Hierarchy that will prohibit tall buildings outside of the identified Tall Building Zones. As owners of Ham House, a significant grade I listed building within the borough, we particularly support criterion 1 within Visual Impacts which requires tall buildings to respect the views and vistas towards heritage assets across the borough, and criterion C2 for Mid Rise Buildings which requires proposals to respond positively and protect the setting of existing buildings in the surrounding area, including heritage assets. We suggest strengthening policy wording by changing policy wording to read: C2 ‘respond positively and protect the setting of existing buildings in the surrounding area, including heritage assets and their setting’.</p> <p>Changes considered necessary: We suggest strengthening policy wording by changing policy wording to read: C2 ‘respond positively and protect the setting of existing buildings in the surrounding area, including heritage assets and their setting’.</p>
Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 45 - Tall and Mid Rise Buildings	<p>London Plan (2021) Policy D9 states that Development Plans should define what is considered a tall building for specific localities based upon local context and should not be less than 6 storeys or 18m. Draft Local Plan Policy 45 sets out the Councils definition of a tall building in the borough, as ‘<i>buildings which are 7 storeys or over, or 21 metres or more from ground level to the top of the building</i>’. The Council however also include a definition of ‘mid-rise’ buildings, separate to the London Plan requirements, which are classified as building that ‘<i>are 5 storeys or over, or 15 metres or more from the ground level to the top of the building (whichever is lower)</i>’. The accompanying subtext justifies the additional definition due to the low-rise nature of the borough and the ability for mid-rise buildings to be substantially taller than their surroundings.</p> <p>The building height categorisations are supported by the Urban Design Study (2021) which forms an evidence document for the draft Local Plan. This provides an analysis of character of areas and provides suitable locations for both tall and mid-rise buildings. The Greggs site is not included within either categorisation and thereby excluded within the areas deemed appropriate for tall or mid-rise development within Picture 22.1 of the draft Local Plan.</p> <p>The refused August 2020 scheme for the Site proposed a mix of building heights rising to 5-storeys across the Site. As noted above, this application was refused primarily on the basis of loss of industrial floorspace, whilst Officers supported the proposed design, scale and massing. In concluding the acceptability of 5-storeys on the site, Officers referred to the to the approved Lockcorp House development adjacent which was allowed on appeal in June 2020 (LPA Ref. 19/2789/FUL). Specifically Officers noted that: <i>‘The proposed four and five storey buildings toward the northern side of the site are similar in scale to Lockcorp House in relation to their height. This building was allowed on appeal on 18 June 2020 for a five-storey building...It is acknowledged that construction of this building has not yet begun, however it provides a strong point of reference as to what may be considered acceptable in terms of height in this area.’</i></p> <p>The support for 5-storey development on the Greggs Site is also reiterated within the Urban Design Study (2021) which states in regards to the refused scheme that: <i>‘The scheme layout reflects the scale and massing of the surrounding streets, with townscape typology creating a new mews and a step up in scale to match the adjacent industrial building.’</i></p> <p>The acceptability of a 5-storey building on the Site has therefore been confirmed by Officers as part of the refused planning application and within the Urban Design Study. On this basis the appropriateness of a 5-storey development on the Site has been established, and the Greggs site should therefore be included within Picture 22.1 as an area suitable for mid-rise development within the Local Plan.</p>
Neil Henderson, Gerald Eve on behalf of Reselton Properties	Policy 45 - Tall and Mid-Rise Building Zones	<p>Policy 45, Sub Section A- The policy as drafted is too prescriptive and gives no opportunity for consideration of detailed design being able to influence the extent to which a location is capable of being able to accommodate a tall building. This is particularly the case when identifying indivual areas for a mixture of tall and mid-rise zones. The precise location within the zones for tall buildings should be subject to detailed design and consideration against the tall buildings policy framework of D9. It is therefore suggested that the drafting should be amended as follows "Proposals for tall buildings will NORMALLY only be appropriate in tall building zones". Appendix 3 and the Policies Map do not appear to have been issued for consultation so we reserve the right to comment further on the issue at Reg 19 Stage.</p>
George Goodby, Environment Agency	Policy 45.Tall and Mid-Rise Building Zones	<p>Point B of this policy should recognise the biodiversity value of setting tall buildings back from the river. Tall buildings should be set far enough back to prevent shading of the river. This is so any buffer zone has sufficient sunlight to allow the ecosystem of the river corridor to function.</p> <p>Proposals for tall buildings close to a river should be submitted with a Transient Overshadowing analysis, demonstrating overshadowing throughout the year and at various points during the day.</p>
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 45.Tall and Mid-Rise Building Zones	<p>The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a ‘Tall’ or ‘Mid-rise’ buildings Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of ‘Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup’s Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading ‘F. Richmond and Richmond Hill’ relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). * In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.</p> <p>Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that ‘Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land’ has no relevance at all to the existing urban character of Richmond, its sustainable development, its enhancement or the provision of ‘affordable housing’ for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.</p>
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to high rise development)	<p>We are deeply concerned at the support given for high rise development at the Richmond Station and comment on Site Allocation 24 Richmond Station, 28 Homebase and 29 sainsbury’s and Policy 45 Tall and mid-rise Building zones. [See other comments]</p>
Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to high rise development)	<p>We are concerned at the support given for high rise development at the Richmond Station and elsewhere given the potential for interrupting views and vistas that are so important to the Old Deer Park. We comment on Site Allocation 24 Richmond Station and Policy 45 Tall and mid-rise Building zones. [See other comments]</p>

Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 45.Tall and Mid-Rise Building Zones	<p>The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a ‘Tall’ or ‘Mid-rise’ buildings Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of ‘Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading ‘F. Richmond and Richmond Hill’ relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). * In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.</p> <p>Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that ‘Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land’ has no relevance at all to the existing urban character of Richmond, its sustainable development, its enhancement or the provision of ‘affordable housing’ for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.</p>
Councillor Richard Warren	Policy 45. Tall and Mid-Rise Building Zones.	<p>I am wholly opposed to designating North Sheen as a location suitable for tall buildings. In 2019, Richmond Council followed planning officers' recommendations to refuse permission for a nine-storey block at the Homebase, Manor Road site, so it is not clear why the council would now sanction eight-storey blocks in this same location. An eight-storey building would only be marginally less overbearing than a nine-storey building. I would imagine it would still be visible from conservation areas and would cut out light from neighbouring homes. This is especially so, as the plan envisages and eight-storey building on the edge of the current Homebase, Manor Road site, where it would loom over cottages and mid-rise buildings on the opposite side of the railway tracks.</p>
Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Evidence Base – Urban Design Study (2021)	<p>The Urban Design Study (the “Study”) has been prepared by Arup, on behalf of the London Borough of Richmond upon Thames (“LBRuT”). It was published on 9th December 2021. Arup also drafted the Urban Design Study for the London Borough of Wandsworth (“LBW”), prepared and published in December 2020 to support the borough’s Local Plan. The LBW Local Plan is in the final stages of the adoption process, having published a Regulation 19 Draft of their Local Plan, with consultation due to end in February 2022. As the LBW local plan is further advanced than the LBRuT, having responded and incorporated changes to their Regulation 18 draft, it provides a useful comparison when assessing the evidence base used in relation to the LBRuT Urban Design Study (2021) and the consequent drafting of planning policies set out in the borough’s Regulation 18 Draft Local Plan.</p> <p>Studies and Supplementary Planning Documents (adopted and in draft) prepared by other London planning authorities, specifically concerning the development of tall buildings also provide further opportunities to compare the detail of supporting evidence base used across London and setting parameters for future tall building development.</p> <p>This section is structured in the following way:</p> <ol style="list-style-type: none">1. We describe the structure of the Urban Design Study (2021);2. We provide a commentary on the Study’s content, focussing on the soundness of the supporting evidence data; and3. Analysis of the Kew Retail Park. <p>We provide a summary of the methodology and logic flow of the Study because it sets out the basis for drawing conclusions about where tall buildings are likely to be acceptable in the future. That methodology is crucial in understanding the soundness of the evidence base.</p> <p>(1) Structure of the Technical and Baseline Study</p> <p>Sections 1 to 3 of the Urban Design Study (2021) provide an introduction to the LBRuT, as well as provide an overview of the methodology which underpins the evidence base. It includes a summary of the borough’s built and ecological environment, as well as townscape character assessments for identified areas, separated into sub-character areas within wider areas known as “Places”. Character assessments for each “area” include a brief overview of key local characteristics, the identification of valued and negative features, building typologies, concluding with a sensitivity value, outlining the appropriateness for change/development within the area.</p> <p>Section 4 identifies capacity for growth within each identified sub-character area, providing a high-level evaluation of the potential for growth across the borough. The capacity for growth of an area is specifically concerned with the potential for tall buildings within the borough, utilising the assessment set out within the character assessments in Section 3.0 of the Study as a supporting evidence base. To inform an area’s capacity for change, Sensitivity to Change and Probability of Change are calibrated using a matrix (Figure 2.3 of this note) [see below] in order to determine the ‘Development Capacity’ for an area. Such conclusions and quantitative figures are then used for the identification of ‘Tall Building Zones’, also identified and set out in Section 4 of the Study.</p> <p>Section 5 of the Study provides general design guidance for the borough, including guidance for design of tall buildings, small sites and riverside areas. Here, the Study provides specific design guidance concerning each sub-character area, setting out a ‘Character Strategy’ for each area, identified on a sliding scale identifying a broad strategy for forward planning and future management.</p> <p>Appendix A provides the supporting evidence and justification for the identified heights for each ‘tall building zone’. Appendix B sets out a detailed description of the methodology underpinning the Study. A review of relevant Planning Policies and an overview of the design quality of ten recent developments within the borough is located in Appendix C, whilst Appendix D contains an overview of predominant building typologies within the borough.</p> <p>Proformas informing character assessments are laid out in Appendix E, whilst a summary of public consultation undertaken is laid out in Appendix F. This completes the Study.</p> <p>(2) Detailed Commentary</p> <p>We find the general underlying principles of the Study sound and well justified. We support the need to identify specific locations for tall building development within the borough, in line with Policy D9 (Part B) of the London Plan 2021, and we agree with the general findings that Richmond and its surrounding environs needs a positive framework for development in consideration of the significant housing pressures facing the Borough. Carefully planning for growth and ensuring development responds to local context underpins good plan-making. The general philosophy of the Study supports this approach and is welcomed.</p> <p>We agree with the approach and adopted methodology set out in detail in Section 4, supported by a relatively comprehensive evidence base in Appendix B. This approach is the same methodology set out in the Urban Design Study prepared by Arup to support the LDW Draft Local Plan (now at Regulation 19 stage) and is based on the accepted and well adopted framework for assessment of townscape and visual effects, set out in the Guidelines for Landscape and Visual Impact Assessment (Third Addition) 2013. The methodology underpinning the Study is therefore considered to be sound. It must be noted that the LBW Draft Local Plan is yet to be found sound, though at Regulation 19 stage, it has benefitted from Regulation 18 consultation.</p> <p>Whilst we agree within the underpinning methodology applied to inform the findings of the Study, we disagree with Arup’s conclusions in relation to ‘Sensitivity to Change’, ‘Probability of Change’, which link directly to the ‘Development Capacity’ of an area – as set out in the matrix at Table 1 on Page 234 of the Study (see Figure 2.3). This is relevant in relation to the Kew Retail Park site and wider East Kew Mixed Use Character Area (Area G3).</p> <p>Further to the implementation and application of the supporting methodology, we are concerned with the lack of detail set out in the supporting evidence data, particularly that used to underpin policies defining where tall and mid-rise buildings are considered appropriate. We have further concerns with the identification of ‘Tall Building Zones’ which identify specific scales of</p>

		<p>development, which, when coupled with a cursory analysis of the surrounding townscape character of the area, is not justified and considered unsound. We cover each point in detail below, with specific reference to Sub-Character Area G3: East Kew Mixed Use Area, as well as Kew Retail Park.</p> <p>Evidence Data</p> <p>Page 178 of the Study comprises an overview of the townscape character of the East Kew Mixed Use Area (identified at Figure 2.1). The Study states that the East Kew Mixed Use area (Area G3) has a ‘mix of features, but lacks a cohesive layout’, and that the area ‘lacks identity, with little obvious relationship with its geographic context, including the adjacent River Thames’. Whilst we generally agree with the findings of the townscape character assessment of the area, we have concerns with the level of detail provided and question its ability to support the parameters set out in draft policies within the LBRuT Draft Local Plan. We question its ability to support references to specific scales of development, along with set limitations on height and massing, as set out within the current draft Site Allocations and the wider Place-based Strategies.</p> <p>The notion that the Study is not supported by a sufficient and well-informed assessment is endorsed by introductory text at Page 17, which states: ‘The Study is intended to be an overview, rather than a detailed analysis’</p> <p>Additionally, in relation to the sensitivity assessment, the Study states:</p> <p>‘It should be noted that the sensitivity assessment has been undertaken at a borough-wide scale and is therefore necessarily broad-brush in its application. Within each of the areas identified there may be specific sites with a high or lower sensitivity than illustrated.’</p> <p><i>Figure 2.1: East Kew Mixed Use Character Area Plan. Figure 278 of Arup’s Urban Design Study (2021)</i></p> <p>In relation to the East Kew Mixed Use character area (Area G3), the identified area includes West Park Avenue. Given that this is area is more similar in character to Kew Residential (Area G2), we would suggest that the boundary is amended to better reflect the distinction between these character areas. A revised boundary could run along the Kew Meadow Path which naturally separates the Kew Retail Park site and West Park Avenue with mature trees of significant height. Everything to the south of West Park Avenue should remain in the East Kew Mixed Use area (Area G3). The assessment of the East Kew Mixed Use area (Area G3) sets out a high-level summary of the townscape characteristics of the area. This is essentially an overview, highlighting overarching features of the area’s townscape character, including a short list of positive and negative townscape features. Negative features for the character area are identified within the Study at Page 180. These are identified as the following:</p> <ol style="list-style-type: none"> 1. Lacks coherence in layout, which gives the townscape poor legibility; 2. Lack of character and sense of identity; 3. Impermeable boundaries and blurred divisions between public and private space makes the area feel unwelcoming in places; 4. Poor relationship with and connectivity to the Thames corridor, from which it seems disconnected; 5. Mortlake Road (A205) forms a busy, southern boundary with little sense of place. <p>From undertaking our own assessment of the East Kew Mixed Use Area (Area G3), whilst we agree with the negative townscape features identified by Arup and set out above, we would go further in our assessment of the area, adding that the area:</p> <ol style="list-style-type: none"> 6. Is divorced from the high quality, residential townscape area of Kew Residential (Area G2); 7. Has a coarse Urban Grain that starkly contrasts with the local context which is largely suburban speculative terrace housing together with large format buildings such as the National Archives; 8. Poor architectural treatment of large commercial buildings within Kew Retail Park; 9. Large areas of hardstanding associated with the Kew Retail Park; and 10. High levels of vehicular traffic associated with the Retail Park. <p>As outlined in points 6-10 above, we consider the East Kew Mixed Use area is divorced from its surroundings’ locality, particularly the superior townscape quality of the Kew Residential Area (Area G2) and the River Thames to its north-east.</p> <p>Within their study, Arup identify five Valued features of the area (Page 180). These are as follows:</p> <ol style="list-style-type: none"> 1. Ecological and biodiversity value of areas of woodland and scrub, including areas designated as OSNI and SINC (borough grade II) at Kew railway bridge and Kew Meadow Path next to the public right of way; 2. Proximity to the River Thames and Access to the Thames Path; 3. The role the area plays as a setting to the River Thames and Thames Path, including the dense trees and vegetation which create a perception of greenness with few views of development from the Thames Path, river, the opposite bank in LB Hounslow and in views west from Chiswick Bridge; 4. Allotment next to the Thames Path;
--	--	--

5. The extensive landscape setting around Kew Riverside residential development which integrates buildings well into their surroundings. In our judgement points 2, 3 and 5 of these ‘Valued Features’ constitute repetitions, and can be summarised as follows:
‘The area’s dense vegetation coverage provides a perception of greenness and screening in relation to the River Thames, evoking an extensive landscape setting which positively contributes to the River’s setting.’
In relation to the design guidance for the East Kew Mixed Use area (Area G3), the Study states that tall buildings are to be set in landscape (Page 302). We do not consider this an appropriate approach to the urban design for the area, given its urban context. The guidance goes on to state that development within the area should *‘Improve connectivity within the area, and to the riverside’*. As referenced by Arup within the Study (Page 302), the area comprises numerous private plots of land, making improved connectivity, especially along the eastern boundary of the Kew Retail Park site, difficult to achieve. This demonstrates the need for a detailed townscape character assessment and site analysis to fully understand the constraints and complexities of the Kew Retail Park site and to better inform the proposed. design guidance.
Given the weight attributed to townscape character within planning decisions, the need for future development to contribute positively to the borough’s rich townscape, as well as the weight its attributed in setting our specific scales and levels of development throughout the borough, we are concerned with the lack of assessment undertaken throughout the Study, particularly in relation to townscape analysis of specific character areas.
The Study fails to identify existing tall building development within the borough. Whilst we agree with the statement made at Page 43 that *‘modern tall buildings and tower blocks are relatively rare’* across the borough, tall buildings do exist, away from the areas of Twickenham town centre and East Twickenham local centre. This includes relatively modern residential development at Vineyard Heights to the east of Chiswick Bridge, as well as the former Stag Brewery fronting the River Thames and the National Archives at Kew. This highlights disparities within the evidence base and the lack of a thorough, granular assessment.
A granular analysis of townscape characteristics is required to provide a sound understanding of the existing and emerging context to inform specific development parameters for sites within the borough. The Study identifies specific parameters for tall building development, identified as ‘Tall Building Zones’ within Appendix A. These ‘Zones’ are specific and constrained and are not considered to be supported by sufficient supporting evidence to justify the identification of exact/precise parameters of development.
Section 4.6 (Page 240) provides a definition of tall buildings in LBRuT, based on an analysis of existing tall buildings, consented schemes and masterplans, as well as scenarios prepared specifically for the study.
Firstly, there is a presumption here that tall buildings are only acceptable within town centres, or where existing development has a negative impact/contribution on the character of an area. In our considerable experience of working on tall building projects, tall building development is capable of being acceptable in areas of lower height. What matters is the quality of their design and the way in which they respond and relate to the existing and emerging context, and the way the transition between scales is manifested. There are many examples of where this approach is acceptable in townscape terms and in sensitive heritage locations.
Indeed, London Plan (2021) Tall Building Policy D9 allows for such an approach to be taken. We highlight the recent Hillingdon judgement [Case Ref: CO/1683/2021] which makes clear that tall buildings can be found to be acceptable in areas that are not identified as being acceptable by local planning authorities, where they meet the terms of Part C of D9. Thus, the analysis of acceptability should allow for some flexibility when forming a broad definition of where tall buildings are permissible (we refer to draft Policy 45 which we highlight in Section 21 of this report, and where we make a similar comment).[See comment in relation to Policy 45]
Page 237 of the Study states that the evidence base does not show, nor considers where newly consented tall buildings are expected to be built across the borough in the coming years. Emerging context is a weighty material consideration when understanding how a place/area is to evolve over time, and where intensification of development has been established and is likely to be accepted in the future.
In relation to East Kew Mixed Use Area (Area G3), this includes the omittance and lack of reference to the Kew Biothane Plant redevelopment, comprising the introduction of a six-storey, specialist residential development fronting the River Thames (ref: 18/3310/FUL). Whilst reference is made to the Kew Biothane site later in the Study (Page 302 & 375), these references are not carried through to the wider assessment of ‘Probability of Change’ and ‘Development Capacity’ conclusions. Furthermore, such emerging context/development is a key consideration when setting development/height parameters for tall building zones within an area. We consider this point again when discussing the Kew Retail Park site (Section 2.3).
Applying the Methodology
In relation to the East Kew Mixed Use area (Area G3), if the supporting evidence data was underpinned by a proper and thorough assessment, which would have identified the significant imbalance between positive and negative townscape features within the area (as reference in Paras. 2.19 – 2.23), the resulting sensitivity would be identified as Low, rather than the currently identified Medium, as illustrated at Figure 2.2.
Figure 2.2 Sensitivity Plan. Figure 268 of the Urban Design Study (2021)



It is stated at Page 238 of the Study that Kew Retail Park is identified as being known to benefit from an emerging masterplan or subject to on-going /emerging redevelopment opportunities. Within the Draft LBRuT Local Plan, the Retail Park has been provisionally allocated for a ‘*Comprehensive residential-led redevelopment of the site with a range of commercial uses, including retail, offices and leisure*’. It is therefore widely known, and more importantly, LBRuT anticipate significant redevelopment of the site over the next plan period (circa. <5 years). We question, therefore, the area’s identification as having only a Medium ‘Probability to Change’. Whilst we acknowledge the East Kew Mixed Use Area comprises land beyond the Retail Park boundaries, the Retail Park and associated large surface car park covers approximately 35-40% of the sub-character area’s total land area. Significant intensification and redevelopment should therefore be expected and anticipated to come forward within the area. This, coupled with the draft site allocation at the Kew Biothane site, and the identification of the long-term opportunity to transform the character of the area (Page 302 of the Study), means the Probability of Change for the East Kew Mixed Use area should be elevated to High.

Putting a ‘Sensitivity to Change’ of Low and a ‘Probability of Change’ of High through the Study’s Matrix (see Figure 2.3), we conclude that the ‘Development Capacity’ of the East Kew Mixed Use area (Area G3) should be scored at 7, the highest rating.

Figure 2.3: Development Capacity Matrix (Table 1 of the Urban Design Study, 2021)

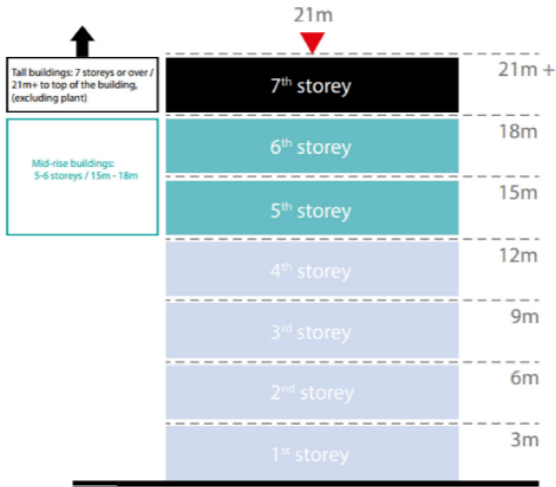
		Probability			
		High	Medium	Low	Very low
Sensitivity	High	5	3	2	1
	Medium	6	4	3	1
	Low	7	5	3	2

Definition of Tall Buildings

As stated in Para. 2.24, Section 4.6 (Page 240) of the Study provides a definition of what is considered a tall building within LBRuT. A tall building is defined within the Study as: ‘*Buildings which are 7 storeys or over, or 21m or more from street level to the top of the building, whichever is lower*’.

There is a lack of consistency with the implementation of LBRuT’s definition of a ‘tall building’. We have identified references within the Study where Arup have identified buildings which are mid-rise (by LBRuT’s definition), incorrectly as ‘tall buildings’. Page 237 of the Study identifies the extant permission at Kew Biothane Plant within the East Kew Mixed Use area (Area G3) as a ‘Consented Tall Building’. As set out at Page 375 of the Study, critical praise is given to the design rationale behind the redevelopment proposals presented at Kew Biothane. As stated, the maximum height of the extant permission on the site is six-storeys, therefore constituting a ‘Mid-Rise Building’ as illustrated in Figure 2.4 below. This illustrates one example that reflects a broader lack of consistency.

Figure 2.4: Definition of tall and mid-rise buildings for Richmond (Figure 374 of the Urban Design Study, 2021)



Tall Building Zones

Section 4.6.4 of the Study uses the constraints and opportunities identified in the preceding sections to identify ‘Tall Building Zones’. The Study states: ‘*The following pages provide the appropriate height and a description of the tall building zones and mid-rise building zones within each Place*’.

Appendix A provides the supporting evidence and justification for the extents and appropriate heights of each of the identified tall building zones. The Study states at Page 316 that: ‘*The broad areas identified in the tall buildings strategy have been analysed to understand whether there are individual zones within them that have the potential to accommodate tall buildings*’.

The analysis identifying if an area is appropriate for tall buildings includes a high-level assessment of the potential impacts a tall building may have on:

- Townscape character, including relationship to existing landmarks and the River Thames;
- Views and visual amenity, including long range views (particularly local or strategic views); and
- Heritage assets, including the setting of Kew Gardens World Heritage Site, Registered Parks and Gardens, Scheduled Ancient Monuments, conservation areas and listed buildings.

Zones are then tested using analysis of:

- Scenarios developed specifically for the Urban Design Study;
- Consented tall buildings and/or masterplans; and
- Existing tall buildings and how they contribute (positively, negatively or neutrally) to the existing character of an area.

The Study states that the scenarios developed in order to test the appropriateness of Tall Building Zones have been prepared solely for the purpose of testing additional height and density at a site and are not intended to be viable site-specific masterplan proposals (Page 316). This approach ignores the importance of viability in order to ensure development can, and ultimately will be delivered on a site and is therefore not sound.

	<p>The Study further states at Page 241 that, <i>‘Tall buildings shall: incorporate an appropriate range of building heights and open spaces’</i>. Whilst this statement is generally supported, its implementation in practice will be difficult to achieve if there is not a ranged figure for tall building zones. This is particularly relevant in relation to the Kew Retail Park site, where the current drafting of LBRuT’s policy restricts development to 7-storeys. This is discussed further at Paras. 2.52 – 2.60 [see below].</p> <p>Spatial Hierarchy</p> <p>In Section 5 of the Study (Page 264), it is stated that, <i>‘Tall buildings require more space around them to ensure they integrate well into the overall townscape’</i>. This is not necessarily the case, and the Study presents little evidence to support this statement. The example given is, <i>‘In many estates this is managed through extensive parkland settings with mature trees’</i>, which suggests a typical mid-late-20th century tower block set in surrounding landscape. It is unlikely that this example of urban design would be appropriate and suggesting such development would limit the ability to create a fine grain masterplan that integrates with the surrounding urban fabric, resulting in an inefficient use of land.</p> <p>The Study goes on to suggest (Page 264) that tall buildings can soften their impact at ground level through <i>‘generous walkways and mature planting’</i>. As stated later in this representation in Section 21, this appears to conflict with the policy set out in London Plan Policy D9, which states, <i>‘The function of the base should be to frame the public realm and streetscape, articulate entrances, and help create an attractive and lively public realm which provides a safe, inclusive, interesting, and comfortable pedestrian experience’</i>.</p> <p>(3) Analysis of Kew Retail Park Site</p> <p>Kew Retail Park is located to the west/south-west of the River Thames, accessed through a residential, suburban neighbourhood, situated off Bessant Drive. The site comprises a large retail unit of a large footplate, surrounded to its south and west by large and associated car-parking facilities. To the east, modern, mid-rise, residential development sits between the site and the western towpath of the river, whilst to the north-east, the large format building of the National Archive is located circa. 120m from the site’s northern/north-eastern boundary.</p> <p>The Retail Park contrasts greatly with the suburban and residential townscape character which prevails throughout the surrounding local context. Whilst landscape buffering and sapling trees within its carpark help soften its appearance to a degree, its commercial townscape character greatly detracts from the high-quality, residential townscape seen to the south and west. Furthermore, blank elevations with little articulation provide little to no permeability through the site, acting as a solid barrier to the River Thames to its east.</p> <p><i>Figure 2.5 Satellite Image of Kew Retail Park Site (Outlined in Red)</i></p>  <p>It is noted within the Study that the site lacks a cohesive layout, has a poor legibility or identity and does not positively contribute to the character of the wider area. As stated above, in our judgement, the analysis of the existing situation at Kew Retail Park should also conclude that the Site detracts from the high-quality residential townscape seen across neighbouring sub-character areas, as well as detracting from the relatively high-quality modern residential development and associated landscaped areas closer to the River to the north-east. Whilst we agree with the Character Strategy set out at Page 302 of the Study, in that there is a long-term opportunity to transform the area’s character, the Study can and should go further to identify significant opportunities to introduce high-quality intensification on the Retail Park site, introducing development that will make best use of the land and contribute positively to the surrounding area.</p> <p>The scenario presented for Kew Retail Park tests two possible building heights: seven and nine-storeys. In reference to nine-storeys (Figure 2.6), the Study states that a Zone of Theoretical Visibility (ZTV) was produced to identify visual receptors. The Study does not present/illustrate the ZTV concerning the nine-storey scenario. This should be made available for review and comment.</p> <p>The ZTV presented at Page 336 of the Study (Figure 2.6) illustrates the ZTV of seven-storeys located at the centre of the Site. Firstly, we welcome Richmond’s identification of Kew Retail Park as being able to accommodate tall buildings. Whilst welcomed, it is demonstrated in the presented ZTV that visibility of such a scale (seven-storeys) is limited to the local area, with partial visibility from the surrounding conservation areas and neighbouring sub-character areas. The Study notes that there is no visibility from within Kew Gardens at seven-storeys. We question why the Study does not take into account/test an eight-storey scenario on the Site.</p> <p>Visibility of such a scenario (eight-storeys) would continue to be limited to the local area, whilst continuing to sit comfortably within the viewpoints identified at Page 337 of the Study (Figures 2.9 & 2.10). Eight storeys at the site would not change the conclusions reached in relation to seven storeys, in that the scale of the development sits comfortably with the scale of existing development along Defoe Avenue, and massing does not extend above the vegetated skyline of the River Thames corridor.</p> <p><i>Figure 2.6: Kew Retail Park Zoner of Theoretical Visual Influence (seven storeys) (Figure 440 of the Urban Design Study, 2021)</i></p>
--	--



Figure 2.7: Kew Retail Park Masing Model Illustrating Nine-storeys on the Parameters of the Site (Figure 439 of the Urban Design Study, 2021)



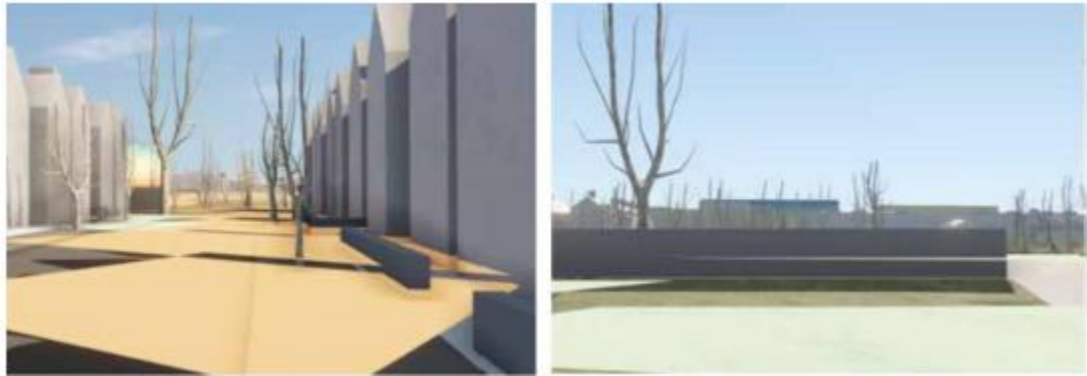
Whilst it is understood that the scenario presented at Kew Retail Park is a conceptual model, a future redevelopment proposal at the Retail Park would comprises high-quality articulation, orientation, profiling and be of varied heights across the Site.

Presenting a block model of nine-storeys across the site (Figure 2.7) does not represent a viable and rational form of development that would come forward, or one that would be considered acceptable.

With the limited analysis of the townscape character of the area, the lack of detailed assessment and testing of numerous viewpoints and differing scenarios, the precise height parameters of seven-storeys is unjustified. The appropriate location and heights of buildings should be subject to detailed testing and the Landowners would welcome involvement in this process. If further testing is not to be undertaken, a broader approach to potential height on the site should be implemented, setting a ranged figure between five to nine-storeys, with the acceptability of any future proposals based on the merits of an application/design rationale, even if development exceeds these figures.

The justification for the building zones set out on Page 335 of the Study require further detailed investigation. The Study notes that the mid-rise building zone provides an area of transition to the more modest buildings in the surrounding area. This is true along the western boundary of the site, where it neighbours properties along West Park Avenue, however, it can be argued that this zone should extend to the southern boundary, as the neighbouring properties are also of a similar scale (circa. 4-5 storeys) to what is proposed as being the mid-rise building zone.

Figures 2.9 (left) and 2.10 (right): Left –VuCity view along Defoe Avenue representing seven-storeys. Right – View from the opposite river bank in LB Hounslow. Figures 441 & 442 of the Urban Design Study, 2021.



In summary, the scale of any redevelopment of the site should not be constrained by overly restrictive policy requirements that will adversely impact on viability and may prejudice redevelopment proposals. Instead, the scale of development should be optimised, with the focus being on design quality and placemaking, based on sound detailed analysis.

Whilst we agree with the findings of the Urban Design Study that Kew Retail Park is capable of accommodating tall buildings, we find the height parameters presented to be overly conservative and restrictive.

Overall, given the flaws in the Study, we consider that the evidence base is unsound.

<p>Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer</p>	<p>Policy 45 Tall and Mid-Rise Building Zones</p>	<div><div>Recommended Amendments (tracked changes to Reg.18 draft text)</div><div><div><div>5. Development proposals should be supported with <u>visual impact analysis graphic 3D modelling</u> to assess the individual and cumulative impact of the proposal on both the existing and emerging skyline, and on day-time and night-time views, in line with Policy 44 Design process.</div><div>6. Development proposals affecting the setting and approaches of the Kew World Heritage Site, must address all criteria set out in Policy 29 Royal Botanic Gardens, Kew World Heritage Site</div><div>Spatial Hierarchy</div><div>7. The massing of tall buildings should <u>respond to</u> respect the proportions of their local environment, including the consideration of the width of adjacent streets as well as public open spaces, parks and watercourses, and should be designed so as not overwhelm the street and adjacent context.</div><div>8. In cases of tall buildings located close to the street edge, proposals should incorporate measures to soften their edges and provide positive public spaces at their base through the use of generous walkways and mature planting.</div><div>9. Proposals for Tall Buildings will not be permitted outside the identified Tall Building Zones (see Appendix 3)</div><div>10. Proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones in Appendix 3. The height of tall buildings will be required to step down towards the edges of the zone as indicated on the gradient map</div></div><div><div>Tall and Mid-Rise Building Near the River Thames Frontage</div><div>B. Proposals for tall and mid-rise buildings should address the following criteria:</div><div>1. The design of Tall buildings and mid-rise buildings fronting the River Thames must respond to views towards them as well as from them.</div><div>2. In areas of larger-scale riverfront buildings, consider landward facing orientation and <u>respond step down</u> appropriately to provide a transition towards the existing character and scale.</div><div>3. The design of tall buildings and mid-rise buildings should maintain the river frontage as a public resource. Developments should <u>respond to be set back to</u> physically and visually ensure the Thames Path acts and feels like a welcoming public route without heavy overlooking from adjacent riverside residences. Ground floor uses should seek to activate the space as far as possible.</div></div><div><div>Mid Rise Buildings</div><div>C. Proposals for new mid-rise buildings or extensions to existing buildings which increase their height to 5 storeys or over, will usually only be appropriate in mid-rise and tall building zones identified on the Policies Map and in Appendix 3. Proposals will be required to meet the requirements of Policy 44 Design process and Policy 28 Local character and design quality and should</div><div>1. be carefully located and designed to <u>respond step down</u> to surrounding existing and proposed buildings;</div><div>2. respond positively and <u>conserve</u> protect the setting of existing buildings in the surrounding area, including heritage assets;</div><div>3. respect the scale, width and proportion of adjacent streets and watercourses, and local character, including potential effects on key characteristics, valued features and sensitivities as outlined in the character area profiles in Section 3 of the Urban Design Study;</div><div>4. deliver a varied and interesting roofline in response to surrounding architectural styles, avoiding long monotonous blocks of development and/or excessive height.</div><div>5. Where proposals are located within identified mid-rise and tall building zones, buildings should not exceed the appropriate height identified in Appendix 3.</div><div>6. In cases of mid-rise buildings located close to the street edge, proposals should incorporate measures to soften their edges and provide positive public spaces at their base through the use of generous walkways and mature planting.</div></div><div><div>Explanation/Justification</div><div>As set out in Section 2 of this representation, we have demonstrated that the supporting evidence base set out in the Urban Design Study (2021) is unsound, lacking in the necessary thorough assessments to support specific height parameters within identified Tall Building Zones (as set out in Appendix 3). Owing to the evidence base that underpins and supports Policy 45 being unsound, we find the drafting of the Policy unsound. The recommended amendments set out above should make the policy sound.</div></div></div></div>
---	---	--

		More specific recommended amendments relate to policy requirements regarding the base of buildings, which require that “generous walkways and mature planting” should be provided at the base of tall and mid-rise buildings. The definition of the walkways is ambiguous, and the expectation of mature planting would be difficult to deliver from day one. There is no evidence provided within Urban Design Study to support this. This part of the policy should be more in line with London Plan Policy D9 which states “The function of the base should be to frame the public realm and streetscape, articulate entrances, and help create an attractive and lively public realm which provides a safe, inclusive, interesting, and comfortable pedestrian experience”.
Alice Shackleton, on behalf of The Kew Society	Policy 45 Tall and Mid Rise Buildings - Kew Retail Park site	The Kew Retail Park site which is earmarked both for Tall Buildings and Mid-Rise Buildings should (over the whole site) be no more than 5 storeys. This would be in keeping with the adjacent Kew Riverside development and the National Archives. A Tall Buildings designation for part of the site will affect views from the MOL of the Thames and be out of keeping with the buildings in the locality. The whole of that site should be no more than Mid-Rise.
	Note comments on site-specific designations for tall and mid-rise zones are included in this schedule under relevant place-based strategies and site allocations and Appendix 3 which identifies each tall and mid-rise zone.	
	Policy 46. Amenity and living conditions	
Tim Catchpole, Mortlake with East Sheen Society	Policy 46. Amenity and living conditions	Again, this could likewise sit better in the section on Local Character and Design Quality.
Mr & Mrs Metcalf	Policy 46 Amenity and living conditions, Policy 28. Local character and design quality - general comments in relation to residential amenity	<p>Our overriding concern with Local Plan is that it is too broadly worded to fulfil effectively one of its key functions, namely the protection of the Borough and its residents from adverse development.</p> <p>This is a particular issue with Policy 28 Local character and design quality (Strategic Policy) and Policy 48 Amenity and living conditions. For example, the latter states that it must be “ensure[d that] balconies do not raise unacceptable overlooking”, that “balconies or terraces on roofs of main buildings can be visually intrusive and result in serious intrusion into the privacy and quiet enjoyment of neighbouring residential properties,” and states that applicants are to “have regard to” SPDs such as House extensions and external alterations, which itself states (at paragraph 3.2.1) that “using the roof of an extension as a balcony, will not normally be unacceptable.”</p> <p>Any ordinary lay reader would reasonably think that these policies prohibit a large first floor roof terrace, above a ground floor extension, affording a vast viewing platform into a neighbouring garden. Yet it would seem that on the strength of the words “have regard” and “normally”, and that “unacceptable overlooking” is subjective, the Borough’s planning officers permitted such a development, simply declaring that it “would not be expected to result in any undue overlooking of this property’s rear garden” (and without even undertaking a site visit to the garden in question). We are, of course, the overlooked neighbours in that particular case. However, this is not “sour grapes”. It is evidence of the fact is that the Local Plan then and as now proposed is insufficiently tightly worded if it can allow such to occur.</p> <p>A further factor here is the unfortunate effect of the Borough’s paying the cost of losing an appeal against its decisions and that only an unsuccessful applicant, rather than an unsuccessful objecting neighbour, is ever likely to be in a financial position to appeal. Naturally that tends to create a situation in which unconscious bias in favour of applicants can arise. (For the avoidance of doubt, NPPF para 11 does not create a presumption in favour of development – it merely requires adopted policies to be followed.) For this reason too, ie to take away the scope for unconscious bias, the policies need to be more tightly worded.</p>
	Reducing the need to travel and improving the choices for more sustainable travel	
Richard Carr, Transport for London (TfL)	General comments in relation to transport policies and evidence base	<p><i>Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a ‘without prejudice’ basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL’s role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Commercial Development to reflect TfL’s interests as a landowner and potential developer.</i></p> <p>As you are aware, the London Plan 2021 was published in March 2021 and now forms part of Richmond’s development plan.</p> <p>We strongly welcome your aspirations to implement the 20 minute neighbourhood concept, reduce the need to travel and improve the choices for more sustainable travel. In particular, we welcome the ambitions set out in the draft local plan to: decrease car use and achieve mode split targets and implement the Healthy Streets Approach. It would be helpful if reference could also be made to achieving the Mayor’s Vision Zero ambition for road safety. We are pleased to see the plan’s recognition of the importance of active travel and public transport.</p> <p>We commend you for adopting London Plan parking standards and the encouragement of car free development. However, this positive approach is not always reflected in site allocations and some of the accompanying text which refers to car parking requirements or needs. We would welcome a more consistent approach to encouraging car free development wherever possible, including the redevelopment of existing car parking and minimising the amount of parking elsewhere.</p> <p>We welcome your intention to seek contributions towards active travel improvements and enhanced public transport capacity and infrastructure. We also welcome the safeguarding of transport land, although this should be extended to existing transport infrastructure as well as future schemes.</p> <p>As part of the evidence base to support the Local Plan we recommend that you consider the potential need for a borough-wide strategic transport assessment which would look at the cumulative impact of major site allocations and the expected background growth in travel. This would help to address concerns that may be expressed about the deliverability of Local Plan proposals and would be useful when considering the transport impacts of major sites when they come forward for development. TfL has a number of modelling and assessment tools that could be made available to consultants carrying out the assessment work on your behalf.</p> <p>Our responses to specific points in the draft local plan are set out in more detail in the attached appendix [See comments in this schedule in relation to place-based strategies, site allocations and policies]. We look forward to continuing to work together in drafting the final document and are committed to continuing to work closely with the GLA to deliver integrated planning and make the case for continued investment in transport capacity and connectivity to enable Good Growth in Richmond and across London.</p>
Janice Burgess, Highways England	General comments in relation to strategic road network and evidence base	<p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). Our network is a critical national asset and as such, we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. There are no sections or junctions with the SRN within the Richmond borough, although a series of junctions lie just beyond the boroughs boundary that could still be affected by development and policies within Richmond. Just beyond the boroughs boundary, the closest junctions and sections of our network include M3 J1 (including a short section of the A316) positioned to the west, and M4 J1 and J2 to the north.</p> <p>We have undertaken a review of the LP (Pre-Publication Regulation 18 Consultation Version) dated 10th December 2021, for which our interests relate to the operation and safety of the SRN. We are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the SRN as a result of the LP proposals.</p> <p>National Highways a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. Highways England is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour. In order</p>

		<p>to constructively engage in the local plan-making process, we require a robust evidence-base so that sound advice can be given to local planning authorities, in relation to the appropriateness of proposed development in relation to the SRN. This also extends to include transport solutions that may be required to support potential site allocations. We would like to draw your attention to National Highways document ‘The Strategic Road Network, Planning for the Future: A guide to working with Highways England (now National Highways) on planning matters’ (September 2015). This document sets out how we intend to work with local planning authorities, communities and developers to support the preparation of sound documents, which enable the delivery of sustainable development.</p> <p><u>National Highways Comments</u></p> <p>National Highways has not provided comments on specific policies or draft site allocations in the LP, but we have provided general comments that relate to our primarily interests for the continuing operation and safety of the SRN.</p> <p>With the borough sharing no boundaries with the SRN, it is accepted that LP policies and development allocations will have no boundary issues related to the SRN, i.e. drainage, boundary treatment, noise, etc.</p> <p>National Highways interests relate to the potential traffic impacts of development allocations and/or policies coming forward, and the need to ensure that these are fully assessed during the plan-making stage. It is also imperative to identify any improvements needed to deliver LP aspirations at this early stage, as set out in Government policy. In terms of site allocations and transport in NPPF (2021), the relevant section from Para. 110 states that <i>‘in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree’</i> Para 111 then states that <i>‘development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’</i>.</p> <p>Paragraph 18 of the DfT Circular 02/2013 states that <i>‘capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage’</i>. This relates to the LP Policy 2 (Spatial Strategy: Managing change in the borough) , which states that <i>‘the overarching aim (of the LP) is to ensure that growth is delivered in a sustainable way, with supporting infrastructure, while tackling the climate emergency and biodiversity crisis’</i>.</p> <p>The covering letter accompanying the Reg 18 consultation states that <i>‘strategic traffic modelling will be explored to consider further the impact of proposed development (as a result of the Richmond Local Plan alone and/or in-combination with others)’</i>. National Highways welcomes this approach.</p> <p>For Local Plan allocations, National Highways would expect necessary SRN improvements to have already been identified and tested as part of the long-term Transport Strategy. This would be supported by traffic modelling and development assumptions, in determining if individual development allocations, and the cumulative LP has a ‘unacceptable’ impact on the SRN. It should identify the provision of infrastructure at the right time to support the development strategy, as part of an Infrastructure Delivery Plan (IDP). As such, as site allocation later come forward as part of the planning application process, they will be expected to proceed in line with the necessary highway improvements identified as part of IDP strategy. This being the case, the only issues for consideration as part of a planning application submission, would be the phasing of the development in relation to the IDP strategy. Highways England would make use of Grampian conditions to ensure that necessary infrastructure is in place prior too or phased in relation to the development becoming operational. This will be necessary to ensure operation and safety of the SRN.</p> <p>National Highways welcomes the LP policies that seek to promote and improve sustainable transport and accessibility, and ensure that each neighbourhood includes a wide range of amenities (i.e. 20 minute neighbourhood), in that private car travel is not required in the first place.</p> <p>National Highways does not raise any concerns with the LP as part of its Reg 18 consultation, but requests that the traffic impacts of site allocations be identified for the SRN. Subject to traffic volumes and traffic modelling, mitigation measures may need to be considered (with a methodology agreed with National Highways). If required, these should be identified as part of the LP, in an IDP / or mitigation strategy. This is a key consideration for Highway England in determining the soundness of the Plan.</p>
	Policy 47. Sustainable travel choices (Strategic Policy)	
Tim Catchpole, Mortlake with East Sheen Society	Policy 47. Sustainable travel choices (Strategic Policy)	<p>We support these policies and note that they are well matched with those promoted by TfL. However, we note that the published evidence base (studies completed and planned) do not include any Borough-based transport studies. We note that developments that would generate high volumes of trips should be focused in PTAL areas 4-6 unless mitigated by bus service improvements. This highlights some of the problems arising from the potential development of the Stag Brewery site.</p> <p>We note from para. 23.12 that safe networks should be created for pedestrians and cyclists and note that this clearly conflicts with the continuing deterioration of safety conditions being allowed around Mortlake Station and the Council’s stance on the provision of local schools. We note that the policy in LP44 about protecting local filling stations has been omitted. Are we expecting filling stations to be phased out as more cars become electric? Where will tyre pumps and car wash facilities be located in the future? This surely needs to be addressed. It should be noted that we have only two filling stations in our area and that one of them is listed Grade II. Will it soon become a listed building under threat?</p>
Susan Norgan	General comments in relation to transport infrastructure and capacity	<p>4. Infrastructure plans are needed for larger developments</p> <p>For example, traffic congestion along South Worple Way has become dangerous. There are four junior schools within walking distance and pedestrians are in danger from cars driving at speed and mounting the narrow pavement to pass cars going in the opposite direction. How will traffic be managed especially HGVs when building the new large development there, and how will new resident traffic be organised.?</p> <p>5. The congestion on the Upper Richmond Road at peak times has caused Queens Road to be used as access to South Worple Way.as a rat run. There have already been problems with large vehicles delivering or removing building materials. There is insufficient turning circle which puts the terraced houses midway along at risk where vehicles mount the pavement.</p>
James Armstrong, Richmond Cycling Campaign	Policy 47. Sustainable travel choices	<p>RCC is overall highly supportive of policy 47, it includes many positive measures to deliver on the Strategic Vision and a borough where choosing to walk or cycle is enabled. We suggest the following improvements (changes preceded and followed by asterisks):</p> <ul style="list-style-type: none">- B. Location of development. [...] or improve infrastructure on the passenger transport network *and cycle network*.- C. Active travel. [...] All proposed pedestrian and cycle improvement works must have regard to the National Design Guide*, Manual for Streets and Local Transport Note 1/20 Cycle infrastructure design.*- D. Inclusive Mobility. Can LBRuT please confirm if this policy refers to Inclusive Mobility: a guide to best practice on access to pedestrian and transport infrastructure’? If not, can this please be referred to.- 23.4. Location of development. Whilst in general higher PTALs are achieved in areas with good rail/tube connections, in this borough it is recognised that bus *and cycle* links also contribute to levels of accessibility.- 23.4. Location of development. Can LBRUT please clarify whether this policy intends that future improvements are to be implemented before the occupation of new development? Travel habits are most strongly formed at the start of occupation or use of an area. Sustainable and Active Travel infrastructure must be implemented before the occupation or use of a new development to have the largest impact on travel choices.- 23.12. Active Travel. It should be clarified that the measures noted in this policy should be applied in all new developments, whilst the use of modal filters should be considered for addition. <p>Reference to Local Transport Note 1/20 Cycle infrastructure design should also be made in addition to the London Cycling Design Standards.</p>

		<p>- 23.13. Active Travel. The council should also ensure that signage and waymarking of the sections of National Cycle Route 4 that passes through the borough is achieved, along with other cycle routes passing through the borough that form part of Richmond's cycle network.</p> <p>- 23.19. Assessing the impact of developments. Developments will be expected to continue travel planning after occupation to maximise travel by sustainable *and active* transport, including personalised travel planning. Existing schools and large employers will also be encouraged to produce travel plans for their sites to help encourage sustainable *and active* travel.</p>
Richard Carr, Transport for London (TfL)	Policy 47. Sustainable travel choices (Strategic Policy) and Paragraph 23.1	<p>We support the potential requirement in part B to provide financial contributions towards increased capacity or improved infrastructure. However public transport capacity constraints may also apply in higher PTALs and so the wording should make it clearer that there is a potential requirement for contributions to public transport in all areas, regardless of PTAL. The level and type of mitigation will be informed by a multi-modal impact assessment.</p> <p>Part C could refer to implementing measures that are identified through an Active Travel Zone (ATZ) Assessment in line with the Healthy Streets Approach</p> <p>Part H should refer to safeguarding existing transport infrastructure in addition to safeguarding transport schemes.</p> <p>23.1 We strongly welcome the borough’s commitment to promoting sustainable travel, decreasing car use, and improving air quality. However, the commitment to decreasing car use could be made more prominent by referring to it in policies. As stated, <i>‘Ensuring that walking, cycling and public transport are the natural choice for trips to and from new developments is vital if these goals are to be achieved.’</i> We also welcome confirmation that Local Plan policies should be read alongside those in the London Plan and the Mayor of London’s Transport Strategy.</p>
Richard Carr, Transport for London (TfL)	Paragraph 23.2	23.2 When referring to the Council’s sustainable transport mode split targets, it is helpful to clarify that developments will need to demonstrate how they are contributing to achievement of those targets.
Theresa Oddelm, The Royal Parks	Reducing the need to travel and improving the choices for more sustainable travel Page 283 onwards– comments specific to biodiversity and the Royal Parks’ Environmental Designations	Specific reference should be made within this section to the impact of traffic and associated air pollution on designated sites and priority habitats, such as: Richmond Park SAC, SSSI and NNR; Bushy Park SSSI; veteran trees (a critical habitat for stag beetles, the SAC designated interest feature, and SSSI designated interest feature); and acid grassland (SSSI designated interest feature). This section should also highlight the need for the impacts referenced above to be mitigated by measures to reduce vehicle traffic in the vicinity of, and through, such sites and habitats.
Alice Shackleton, on behalf of The Kew Society	Policy 47 Sustainable Travel Choices	<p>C - It should perhaps be made clear that such walking and cycling routes should not obstruct public transport nor adversely affect the safety of those less able (eg cycle routes running inside a bus stop so that persons alighting from a bus might encounter cyclists on the pavement where the passengers are alighting - this impacts the elderly and disabled whose needs should be included in such policy). D relates to disabled persons but there are many others (elderly, less able but not disabled for example) who will be excluded by the priority of cycling over public transport which appears to be the case in the draft local plan.</p> <p>Sustainable travel choices should be inclusive and the needs of the increasingly ageing population need to be a very important consideration relating to travel and the 20 minute neighbourhood. There is a great danger that they will be excluded from this concept.</p>
Laura Hutson, Sport England	Policy 47. Sustainable travel choices	Sport England is fully supportive of this policy which promotes a high quality walking and cycling environment in line with Sport England’s own aims around Active Design. [See also comment in relation to Active Environments]
Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 47. Sustainable travel choices (Strategic Policy)	<p>We fully support improvements in transport provision for both cyclists and pedestrians, and appreciate the commitment to signage and way marking of the River Crane Walk (23.13). We support the improvements that have been made in these facilities within the borough during recent years.</p> <p>We believe there is scope for further improvements along the River Crane and DNR that will benefit road traffic management, connectivity and public health. We would like to see improvements to the path beside the River Crane to increase clearances for pedestrians and cyclists under Hospital Bridge Road and the A316; de-trafficking of Craneford Way between the Challenge Court Meadow and Craneford West Field; and the opening of the path through Twickenham Junction Rough, at least during the hours corresponding to other traffic restrictions on RFU Event Days, and ideally on a permanent, unrestricted basis.</p> <p>We remain concerned at the in-borough focus of this specific policy. We know that many people use pedestrian and cycle networks across borough boundaries and this is what enhances their value for local residents and the wider communities. This approach can also bring in funding sources that are not available to in-borough schemes. As yet though, the Local Plan in general does not consider what happens beyond the borough boundary. We believe that the Council needs to consider active travel at a sub-regional level, working alongside other boroughs and in concert with agencies such as Crane Valley Partnership and Thames Landscape Strategy, to help deliver these cross-borough links.</p> <p>In 2019 FORCE worked alongside Ove Arup, The Crane Valley Partnership and The Colne Valley Partnership to produce the “Colne and Crane Valley Green Infrastructure Strategy”. This document sets out a strategy for enhancing the linkages along the Crane valley and Colne valley corridors, linking the Thames with the Chilterns through a network of biodiverse green transport networks https://www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/ LBRuT officers engaged with this project as a key consultee. FORCE considers that the Local Plan would benefit significantly from adopting the Strategy as a strategic objective for enhancing green links between the borough and wider green infrastructure network, as well as committing to some of the very specific interventions identified in the Strategy.</p> <p>FORCE is currently engaged with the Crane Valley Partnership to develop the Smarter Water Catchment programme, funded by Thames Water. One of the key elements of this work is to identify the opportunities and blockages to green travel through the Crane catchment and this work is being delivered by Sustrans. We hope and expect that LBRuT will engage with the next stage of this project, in Spring 2022, which will seek to prioritise improvement options along the corridor, which extends from the River Thames through the London Boroughs of Richmond, Hounslow, Ealing, Hillingdon and Harrow.</p> <p>FORCE has conducted usage surveys for over ten years at multiple locations along the River Crane and DNR, providing quantitative insights into the relationships of residents with their open spaces. Our surveys also show the order of magnitude increases in cyclist and pedestrian usage that can follow investment in new and improved pathways. We would be pleased to share our data and insights, particularly when specific pathway improvements are being planned and designed.</p> <p>In conclusion, FORCE hopes and intends that the above comments are helpful and constructive. We would welcome the opportunity to discuss any of the above issues with officers as the Local Plan is further developed, and we look forward to engaging in the process.</p>
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 47	Part I of Policy 47 (Sustainable travel choices) confirms that, where appropriate, taxis, minibuses, coaches, and private hire vehicles can be safely accommodated. RBGK have seen a reduction in coach parking in recent years which is unfortunate, given that this provides an efficient and sustainable way for visitors to major visitor destinations such as Kew, to get to and from the site with reduced vehicular journeys. Therefore, RBGK support this policy and request that existing coach parking on surrounding streets is retained and, where possible, improved. RBGK also support improvements in public transport infrastructure to reduce car trips. However, the need for sufficient car parking in association with its visitor and specialist staff needs remains an important part of daily operations.
Paul Luton, Cycling UK	Policy 47. Sustainable travel choices (Strategic Policy) – 23 C	23 C Cycling Proposals should adhere to LTN 1/20 ,unless physically impossible, as the most up to date specification
Paul Luton, Cycling UK	Policy 47. Sustainable travel choices (Strategic Policy) – paragraph 23.8	23.8 suggest replacing “create a high-quality core cycle network connecting popular destinations; .with “create a high quality boroughwide cycle network linkng people’s homes with schools, workplaces, shops and other destinations. “
Paul Luton, Cycling UK	Policy 47. Sustainable travel choices (Strategic Policy) – paragraph 23.12	23.12 Management of other users should include “excluding through traffic from residential roads as LTNs.” Maybe “protected lanes rather than “segregation”.

Paul Luton, Cycling UK	Policy 47. Sustainable travel choices (Strategic Policy) – paragraph 23.13	23.13 – this should also extend to NCR 4 in the borough and the local cycle network. (if we had one)
Louise Fluker, The Richmond Society	Reducing the need to travel and improving the choices for more sustainable travel p 283, Paragraph 23.11 (and elsewhere)	Developments must be permeable on foot and by cycle if appropriate.
Louise Fluker, The Richmond Society	Reducing the need to travel and improving the choices for more sustainable travel p 283, Paragraph 23.14	Promoting new access routes and transport links should not cause consequential harm to the amenity of existing users of the route or nearby residents.
Louise Fluker, The Richmond Society	Reducing the need to travel and improving the choices for more sustainable travel p 283, Paragraph 23.24	Local Plan needs to recognise that taxis and PHVs (and mopeds) are increasingly being used to make deliveries from food businesses and dark kitchens (e.g. UberEats). These vehicles aren’t using taxi ranks but need to be managed whilst waiting to avoid bringing harm to other road users.
Luke Burroughs, Transport for London (TfL) Commercial Development	Policy 47. Sustainable travel choices (Strategic Policy)	<p>The policy states the following “<i>The loss of existing bus garages will also be resisted, to safeguard capacity for efficient and sustainable operation of the network, unless it is demonstrated that it is operationally no longer needed or enhanced reprovision has been made elsewhere in a convenient and accessible alternative location.</i>”</p> <p>The wording of this policy as drafted does not recognise that the bus operations can also be made more efficient and sustainable as part of the redevelopment of bus garage sites. We would suggest that the wording of this policy could be changed to “...or enhanced provision has been made <i>as part of a redevelopment of the site</i> or made elsewhere...” to support the redevelopment of bus garage sites where it is appropriate and in line with policy H1 and T1 of the London Plan.</p> <p>Concluding Remarks</p> <p>We hope that these representations are helpful but if you require any further information or would like to discuss any of the issues raised in our representations, please do not hesitate to contact me</p>
Nina Miles, GLA on behalf of Mayor of London	Policy 47. Sustainable travel choices (Strategic Policy)	<p>Transport for London (TfL) has provided detailed comments, attached below at Annex 1. [See comments under Richard Carr, Transport for London (TfL) in this schedule]</p> <p>We welcome the references to Active Travel throughout the Plan and in strategic transport Policy 47 as well as the intention to safeguard land required for transport schemes set out in the London Plan. This safeguarding should be extended to existing transport infrastructure as well as future schemes in accordance with Policy T3 LP2021.</p> <p>It will be important to ensure that the transport chapter identifies the need to secure land for transport and outlines future plans and proposals in line with Policy T3 of the LP2021 and the emerging Sustainable Transport, Walking and Cycling London Plan Guidance (LPG). The Plan should identify walking and cycling networks and any gaps or potential improvements, as advised in the LPG.</p>
Siriol Davies, Ham and Petersham Neighbourhood Forum	Policy 47 Sustainable travel choices	<p>The aims and aspirations of this section are in line with the Neighbourhood Plan and are updated in the context of the climate emergency and new London Plan.</p> <p>C. Active Travel</p> <p>We suggest that it is important to include that active and sustainable travel infrastructure should be installed prior to occupation of new development to enable new residents to make sustainable travel choices and support positive habit formation when people move.</p> <p>72% of greenhouse emissions come from road transport (2017), and it is historically the slowest to reduce, yet with 3/4 of trips under 5 miles, it could respond quickly with behaviour change. Behaviour change needs to be designed for incentivised, over polluting travel and made the natural and safe choice for everyday journeys.</p> <p>By ‘National Design Guide’ can LBRuT confirm they are referring to LTN 1/20, or future equivalent? We support reference to Manual for Streets reinforcing the user hierarchy and importance of place-oriented streets.</p> <p>By ‘Inclusive Mobility’ can LBRuT confirm they are referring to Inclusive Mobility: a guide to best practice on access to pedestrian and transport infrastructure’ or future equivalent?</p> <p>D. Inclusive mobility – we suggest that the Local Plan should address increasing issue of car charging cables across pavement which are a trip hazard.</p> <p>p.285</p> <p>23.4 & 23.6 - Reference to ‘Future improvements’ does not acknowledge that habits are formed when people move/during life changes. Infrastructure to enable people to make sustainable and active travel choices needs to be implemented prior to occupation of new development.</p> <p>23.11 – Taking into account additional travel demand of development and to support active travel.</p> <p>23.12 It might be clarified that new design should meet the London Cycling Design Standards.</p> <p>23.13 Support wayfinding and marking of routes. Cycle routes should be networked and identified by numbers in the same way as the road system to support navigation.</p>
John Waxman, Crane Valley Partnership	General in relation to river corridor enhancement and active travel	[See comment in relation to river corridors]
Suzanne Parkes, Elmbridge Borough Council	Policy 47. Sustainable travel choices (Strategic Policy) - Greener transport and how we move around	We support Policy 47 ‘Sustainable travel choices’ by locating development closer to the public transport network, encouraging active travel and making accessibility easier in Richmond. Though, it is unclear what the proposed major developments are as ‘Table 1’ does not exist in the document and this requires clarification. Whilst Surrey County Council is the Local Highways Authority for the Borough, we would welcome direct discussions on opportunities for connecting our two boroughs through active travel means.
	Policy 48. Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management	
Richard Carr, Transport for London (TfL)	Paragraph 23.10	23.10 When referring to London Plan minimum standards for cycle parking, it is helpful to add that developments that exceed minimum cycle parking provision will be encouraged.
Nina Miles, GLA on behalf of Mayor of London	Policy 48.Vehicular Parking standards, Cycle Parking, Servicing and Construction Logistics Management	We are pleased to note the intention to adopt London Plan parking standards in Policy 48 and the encouragement of car free development in accordance with Policy T6 LP2021. We would also expect to see this approach reflected in the Site Allocations.
Richard Carr, Transport for London (TfL)	Paragraph 23.21	23.21 We welcome safeguarding of bus garage facilities, but it should be made clear that in all cases TfL agreement will be needed to confirm that any replacement facilities are fit for purpose and capable of being delivered, or that existing facilities are surplus to requirements. This will take into account the need for additional space to accommodate alternative fuel facilities.
Clare Snowdon	Paragraph 23.25	23.25 This needs to be balanced against the issues of excessive paving and loss of valuable green space and flooding adaptation
Rosemary Harrison	Draft Local Plan: Page number(s) 289-292 (passim - comments largely relate to what has not been included), Policy 48	<p>Car Clubs</p> <p>Currently the Borough only grants spaces to the most expensive profit-making car clubs available. Has consideration been given to involving a non-profitmaking one which would be less so? (Co-wheels was as I understand it recently forced out of its former limited presence in other Greater London boroughs by high costs.) Previously I have been given to understand that car clubs in Richmond Borough have to pay for their on-street spaces at a rate very much higher than even the second car rate for residents:surely this policy (if still in place as it was when I enquired in 2017) is counter- productive in relation to reducing car ownership? Waiving this cost might enable lower fees to be negotiated with even the commercial car clubs (as has been achieved by, for example, Nottingham and a number of Scottish cities).</p>

Rosemary Harrison	Draft Local Plan: Page number(s) 289-292 (passim - comments largely relate to what has not been included), Policy 48	<p>Parking - CPZ and for new developments</p> <p>I welcome the general approach that new developments will not necessarily be associated with the right to resident parking. However I believe that this should be accompanied by a more general radical approach to CPZ parking rather than individual developments being considered in isolation in these areas. The Council causes a significant problem in my local CPZ (CPZ X – but what I say probably applies elsewhere) by placing no restriction on the number of resident parking badges each household can have, instead of allowing one badge per household as of right, with others only issued up to a maximum that is practicable in relation to the spaces available, taking into account the number already issued. (Clearly it would only be reasonable to improve this gradually, introducing a limit on the right to a second badge on change of property ownership/rental tenancy, so that individuals know what their "deal" will be before moving to the area.) Having no car of my own I find it particularly irritating to have recurring problems because there is insufficient space for contractors' and delivery vehicles on an occasional basis: this is after all an occasional need that is actually fairly regular taken across the parking zone/street as a whole, which in the case of CPZ X the Hampton Wick Library car park only partly alleviates (especially as it only allows smaller vehicles). I have proposed to the Council in the past that there should be a large space that can be taken for a fraction of a day to help with this, using a resident visitor badge: such an arrangement would also mean that, if there were a limit on resident cars per household, those households which were not able to obtain a second badge would have the capacity to load/deliver near their property if they still retained a second vehicle garaged elsewhere. (In marginal cases it might mean that a household might find less need for a second car.) Such a broader-based approach to parking restriction would make it easier to justify not allowing resident parking for new developments.</p>
Richard Carr, Transport for London (TfL)	Policy 48.Vehicular Parking standards, Cycle Parking, Servicing and Construction Logistics Management	<p>We strongly support the requirement to provide cycle and vehicle parking in line with London Plan policies and standards, including reference to London Cycling Design Standards. Where parking is provided, a Parking Design and Management Plan should be submitted with the application.</p> <p>In part F we welcome the encouragement of car free developments in PTAL 3 or above.</p> <p>In F5, where CPZs are not already in place it would be appropriate to encourage developments to provide funding towards implementation of a new or extended CPZ (or equivalent parking controls).</p> <p>In F8, it may not be appropriate to require car club spaces to be provided in developments in areas of very good connectivity where alternatives to car use can provide for all travel needs.</p> <p>In part G, there may be a need to consider on street disabled persons’ parking spaces on constrained sites that are otherwise suitable for car free development. We can provide advice on how this works in other boroughs if helpful.</p> <p>In part H, where there is physically no possibility of accommodating short stay cycle parking on site, on street provision may need to be considered as set out in paragraph 23.35.</p> <p>In part I, it may not be appropriate to require car club spaces to be provided in developments in areas of very good connectivity where alternatives to car use can provide for all travel needs.</p> <p>In part L, it is helpful to refer to TfL guidance on Delivery and Servicing Plans.</p> <p>In part M, to ensure consistency with London Plan and TfL, it would be helpful to refer to Construction Logistics Plans rather than Construction Traffic Management Plans.</p>
James Armstrong, Richmond Cycling Campaign	Policy 48. Vehicular Parking standards, Cycle Parking, Servicing and Construction Logistics Management.	<p>RCC is in overall support of policy 48, including a number of positive policies for improving on and off street cycle parking provision, as well as reducing car dominance. Whilst we understand the need for compliance with the London Plan, the council should explore options to further reduce the number of motor vehicle parking spaces provided with new development, as well as allow for the provision of a greater amount of off and on street cycle parking, including allowing the replacement of on street car parking spaces with secure cycle parking (i.e. lockable cycle shelters featuring anchor points for cargo and non-standard cycles). We suggest the following improvements (changes preceded and followed by asterisks:</p> <p>- A. [...] while minimising the impact *and use of* of car-based travel [...]. - B Vehicular and Cycle Parking Standards. [...] provide off-street vehicular and cycle parking, including electric vehicle charging points *and provision for cargo and non-standard cycles* in accordance [...].</p> <p>- B. Vehicular and Cycle Parking Standards. It should be clarified that whilst electric car charging points are to be provided, this must be done in a way that is not detrimental to the safety of vulnerable road users, avoids unnecessary street clutter, does not detract from pedestrian, cycle or wheelchair user amenity, and wherever possible (when provided on street) are provided on the highway, rather than on pavements.</p> <p>- C. Vehicular and Cycle Parking Standards. The meaning of "well located" should be clarified. Cycle storage must be located such that it is more easily accessible and convenient than car storage, i.e. next to the building entrance, safe, secure and easy to use by people of all ages and abilities.</p> <p>- F. Car-free developments. The deletion of points 4 & 5, or the increase of on-street parking stress permitted to a significantly higher level than 85%. Continued provision of additional parking places (on or off street) perpetuates the dominance of space in the borough by motor vehicles. Cars spend around 95% of their time parked and not in use, stored on public land at no, or a very low cost to owners, but at high cost to to Richmond council (https://www.reinventingparking.org/2013/02/cars-are-parked-95-of-time-lets-check.html). Car free developments are an excellent way to discourage motor vehicle ownership, and must not be constrained by parking stress in the local area, as without the incentive to avoid car ownership provided by high levels of parking stress, much of the impact on travel choices of car free developments is lost.</p> <p>- H. The Provision of Vehicular and/or Cycle Parking Infrastructure on the Highway. Planning applicants will be expected to provide all long and short stay cycle parking off-street, *or through the provision of lockable on-street cycle shelters*.</p> <p>- I. Car Club Bay and Membership Provision. One off-street Car Club space per 100 dwellings is insufficient for the scale of use that could be expected from such a development. Car clubs are a positive measure, but only if deployed at scale can they contribute to reductions in motor vehicle ownership. If a vehicle is not reliably available, car club membership will only ever remain a supplement to owning a car, rather than a replacement.</p> <p>23.25 - Deletion of "The approach aims to ensure that sufficient on-site car parking is provided to meet the needs of the occupiers of the new development, but also to ensure that excessive on-street parking demand is not created which could have an adverse impact on local highway/traffic conditions, street scene and impacts on making the best use of land".</p> <p>23.27, 23.28 & 23.29 - Deletion of these policies, as per explanation regarding policy 48.F.</p> <p>23.35 - The Provision of Vehicular and/or Cycle Parking Infrastructure on the Highway. Deletion of the phrase "where there is local support for the Traffic Management Order required to install them". It seems illogical that public opinion gathering exercises are to be carried out for the installation of cycle hangars, whilst no such requirement is necessary for a resident to store their motor vehicle (often much larger than a cycle hangar) for extensive periods of time on the street. Especially if the cost is to be covered by a developer through a S106 agreement.</p>
Alice Shackleton, on behalf of The Kew Society	Policy 48 Parking	<p>As a general comment, although Electric Vehicle Charging points are proposed/required in certain developments, the use of electric vehicles (just like petrol or diesel vehicles) requires parking facilities. No acknowledgement of this is made as a separate matter of parking, and electric vehicle parking is included in the required reduction of all vehicle parking (with some accommodation for disabled). This seems inconsistent - air quality improvements due to electric vehicle use must occur, charging facilities must be provided: where are they to park?</p> <p>E - car free developments for PTAL3 or above, but PTAL3 is only moderate. Surely, policy must have regard to this so that car-free developments should be considered where there is good public transport - PTAL 4 at least.</p> <p>F 4 - CPZs control parking within certain hours. Realistically, where new developments preclude residents from CPZ permits, those residents can park in the CPZ areas outside the controlled hours, thus increasing parking stress for residents in the CPZ. Whilst the Council wishes to use the local plan to restrict vehicle usage, realistically people do use cars and will increasingly have deliveries of goods ordered online. Deliveries to households do not seem to be addressed.</p> <p>Creating car-free major developments may well increase congestion, parking stress and general difficulties for residents. This may detract from the "living locally" concept by simply increasing problems of everyday living for residents. A more realistic approach could be indicated. If Low Traffic Neighbourhoods are also developed, such difficulties will be exacerbated. Paragraph 25.23 acknowledges this but does not suggest any realistic solution.</p>

Tim Catchpole, Mortlake with East Sheen Society	Policy 48. Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management	We support these policies.
Jon Rowles	Policy 48. Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management	Car-free developments are only mooted for areas with PTAL of 3 or above - but not everyone owns a car and it's not fair to make people pay for car parking they don't want or will not use. Maybe it would be better to shift away from wanting the highest number of 'pure' car-free developments and have a percentage of all developments that are car-free instead?
Alice Roberts, CPRE London	Policy 48 Vehicular parking standards, cycle parking, servicing and construction logistics management	<u>Car free development is supported and more efforts should be made to use planning policy to restrict car parking and driving. We support proposals to restrict front garden parking (Policy 48).</u> Policies could ensure bus lanes, cycle lanes, pavements are given higher priority than
Siriol Davies, Ham and Petersham Neighbourhood Forum	Policy 48 B & C	The location of electric charging points should be promoted within the new development parking provision. Charging points on the street encourage and embed on-street parking which detracts from the attractiveness, safety and amenity of the place. This policy should clarify the meaning of 'well located', to mean locating cycle storage so that it is easily accessible and convenient, i.e. near the building pedestrian entrance. It should also be safe, secure and easy to use by people of all ages and abilities. I. A single off-street car club space per 100 dwellings and thereafter 1 space per 200 dwellings seems far too low in the context of the need to reduce car trips, enable the reduction of car ownership and achieving net zero by 2050. Car clubs are the means and opportunity to reduce car ownership, and by aligning travel cost per journey more closely with the real costs to the environment and society they incentivise sustainable choices. i.e. Car clubs price per journey which is closer to real cost, whilst individual car ownership puts the majority of cost into the initial purchase and then future individual journey costs to the car owner are relatively small, whilst the cost to climate, society and safety are high.
Louise Fluker, The Richmond Society	Reducing the need to travel and improving the choices for more sustainable travel p 283, Paragraph 23.39	This should be expanded to ensure that developers have fully considered and will manage the freight and servicing requirements of residential properties (i.e. not only business needs).
	Securing new social and community infrastructure to support a growing population	
	Policy 49. Social and Community Infrastructure (Strategic Policy)	
Tim Catchpole, Mortlake with East Sheen Society	Policy 49. Social and Community Infrastructure (Strategic Policy)	No comment.
Vincent Gabbe, Knight Frank, on behalf of the Metropolitan Police Service	Policy 49. Social and Community Infrastructure	LSH submitted representations on behalf of the Metropolitan Police Service (MPS) on the 18 of March 2020 to the Richmond Direction of Travel consultation. Representaions were also submitted on 24th January 2020 to the draft Planning Obligations SPD. These representations set out MPS's intention to seek section 106 contributions from major developments, to cover the cost of policing infrastructure required as a result of such proposals. Policy 49 (Social and Community Infrastructure) refers at part F to the need for major developments to assess potential impacts on existing social and community infrastructure and wether there is sufficient capacity to accommodate the needs arising from the new development. However, the draft Local Plan, the draft Section 106 SPD and associated Infrastructure Delivery Plan do not mention the intention of MPS to seek s106 contributions towards policing infrastructure. We believe that this should be explicitly mentioned, so that landowners and developers have a clear understanding of section 106 contributions that will be required. Policy 49 (Social and Community Infrastructure) should make clear under Part F exactly what social and community infrastructure will need to be assessed and make clear that this includes policing. The policy should also make specific reference to the intention of MPS to require section 106 contributions. If necessary, an appendix to the plan could be included to cover this important subject. The Infrastructure Delivery Plan and Section 106 SPD should also make reference to this.
Laura Hutson, Sport England	Policy 49. Social and Community Infrastructure	Sport England notes that the supporting text for this policy outlines that proposals resulting in the loss of an indoor sports facility will be assessed against the Council's evidence base for sport and the NPPF. Encouragement to engage early with Sport England is also welcomed.
Anna Russell-Smith, Montagu Evans on behalf of South West London and St George's Mental Health NHS Trust	Policy 49. Social and Community Infrastructure (Strategic Policy)	Part C (Loss of Social or Community Infrastructure) part 2 states that: <i>"The potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed. This should include evidence of completion of a full and proper marketing exercise of the site for a period of at least 18 months in line with the requirements set out in Appendix 2".</i> Part D goes onto state: <i>"Where the Council is satisfied that the above evidence has been provided and the change of use away from social and community infrastructure use has been justified, redevelopment for other employment generating uses should be considered".</i> To be consistent with other approaches within the emerging Local Plan Part D should be amended to reflect other alternative uses that could be considered appropriate, for example residential, when looking at the potential for sites. This would reflect London Plan policy 5.2.9 which states that <i>"development and regeneration proposals for an area provide an opportunity to re think how land and buildings are used and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities.."</i> It is therefore considered that other priority uses, such as residential accommodation, should be included within part D (or a new point added) to ensure that the development potential for suitable, deliverable and available brownfield sites is optimised.
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Healthy lifestyles and living locally	[See comment on Policy 1 Living Locally]
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 49. Social and Community Infrastructure (Strategic Policy)	We generally support the approach to protect social and community infrastructure (clause C), which would include healthcare. However, when considering the redevelopment or disposal of surplus NHS sites we consider that the policy should be sufficiently flexible to allow the loss of a facility, or part disposal of a site, where declared surplus to requirements in accordance with NHS service transformation and estate strategies. The redevelopment of NHS sites and the introduction of housing and other uses provides vital investment to re-invest in new and improved health facilities which are fit for purpose. This flexibility would accord with clauses F and G of London Plan Policy S1. We support Clause F of the policy. For healthcare, the impact of the development and assessment of capacity is addressed in a health impact assessment. We suggest that there is a cross-reference to Clause B1 of Policy 51. For large development proposals subject to environmental impact assessment the socio-economic impact is typically included in the assessment. We suggest additional wording to state that there is insufficient capacity to accommodate the needs arising from the new development that developer contributions are sought to mitigate this impact. For healthcare, the Planning Obligations SPD (June 2020) identifies the steps that should be taken to identify existing capacity.
Martin Ellis, South West London Clinical	Loss of health facilities	[See comment on infrastructure; and social and community infrastructure against Policy 51]

Commissioning Group (CCG)		
	Policy 50. Education and Training (Strategic Policy)	
Alice Roberts, CPRE London	Policy 50 Education and Training (Strategic Policy).	In working with others to identify sites, it should be explicitly stated that such searches should not include protected green sites or other important green infrastructure. We suggest the borough commissions an independent sequential site search for new primary, secondary and special schools. This could lead to safeguarding of sites in each category.
Heather Mathew, Richmond Council for Voluntary Service (CVS)	3 suggested key areas for inclusion - 2) Property	2) Property The Voluntary Sector as owners/leaseholders of community buildings The Ethical Property Foundation produce a biannual “charity Property Matters Survey” (currently out for input for the 2022 report) In 2020, 200 not for profits in England and Wales contributed to the survey, 45% of whom were based in Greater London. The main property issues identified were affordability of premises, unforeseen cost of repair and maintenance, lack of inhouse expertise in property management, and the cost/ difficulties of compliance with workplace regulations. They also found very low awareness of environmental regulations, most did not have a formal policy for environmental management of their property and just under half had no awareness at all of minimum energy performance standards. Local authorities were landlords to 35% of the sample, with 24% leased from another charity or public bodies. https://propertyhelp.org/help-centre/property-research-2020/ The most common charity sectors represented in the survey were education, health and disability, village halls and community centres, culture, recreation and community development and this and the findings are also reflected in the local picture. From our work on the Richmond Community Fund we are very familiar with outdated community buildings in a poor state of repair in all areas of the borough with groups struggling to maintain and upgrade facilities, or complete basic and essential maintenance. This has been exacerbated in the last two years as income from renting space for community activity and meetings fell away, and membership fees for activity dropped with no alternatives to replace it. During the pandemic we worked with the council finance team to make eligible not for profits aware of the Government Retail Hospitality and Leisure Grants Scheme, and in doing so were surprised to find how many of those owned, leased or rented community buildings, many of which were owned by LBRUT. (18 scout and guide huts for example) Though many of these will feature on the “Right to Bid – Assets of Community Value” register this does not map the totality, and we have no clear understanding of their uses, the community they serve, and their value in terms of their role in supporting the 20- minute neighbourhood concept. With the emphasis on the reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment” (Spatial Strategy B Pg 25) it would also be very useful if the council mapped and reviewed its owned buildings and spaces which it leases to community groups, identified their maintenance/repair/refurbishment needs and prioritised them in term of urgency and benefit to the community. This would then allow for development infrastructure levies and investment to be used appropriately, and help to strengthen the social and physical infrastructure of the 20-minute neighbourhood, whilst also providing an ongoing maintenance timetable within the council estate. [See also comment in relation to office accommodation and a VCS Hub]
Unity Harvey	Policy 50. Education and Training (Strategic Policy) Page 301	I fully support the proposed new secondary school on the Stag Brewery Site. The children of Barnes and Kew particularly need this. There is a large choice of school on the Surrey side of Richmond and only 2 on the eastern side. My own 3 children, now all over 50 years of age, had to commute for over 2 hours a day to Ham – equivalent to a whole day at work each week - tiring... This burden on our children has been going on for too long and they deserve better than this. I feel that the new co-ed non-denominational school can only help. I would hope that the policy enforces the <i>retention of the whole of the existing playing field is retained as green space for the school use too</i> as a real grass playing field.
Heather Mathew, Richmond Council for Voluntary Service (CVS)	Community safety	Community safety – there is mention of it in relation to food and night club licences- ASB and noise but no systematic thought to improving and enhancing both physical spaces and residents’ sense of safety. It does not appear to feature in policy 25 “ Creating Safe, Healthy and inclusive communities (pg 304) Since the murder of Sarah Everard in 2021, there has been increased concern, and local activism relating to public safety – safer streets – reduction in violence against women, street lighting, stop knife crime etc and this needs to be factored in when developing neighbourhoods and thinking about the night time economy. This is captured to a certain extent by “Policy 28 – local character and design quality 11. Minimise opportunities for crime and ASB, based on an understanding of the locality and site-specific circumstances utilising principles of natural surveillance and orientation of buildings as well as uses” but the plan would benefit from overt reference to residents’ concerns regarding public safety and measures to work with them to increase public confidence through the planning of the physical infrastructure of neighbourhoods.
Jon Rowles	Policy 50. Education and Training (Strategic Policy)	24.26 “due to the Greenwich Judgement, places in local schools cannot be reserved only for children resident in the borough.” Incorrect – schools can have admission priority areas, they just can’t be set just on the basis of excluding out of borough pupils. Greenwich Judgement was mainly about Greenwich Council not allowing out of borough pupils to attend its schools despite having places available. This was confirmed in the recent Turing House School adjudication and where Hounslow Council said they would prefer schools in Richmond to have Admission Priority Areas but Richmond Council said they were opposed to them on the grounds that it would confuse parents. 24.32 The Council will work with the Education and Skills Funding Agency, Department for Education, landowners and other partners to identify and, where necessary, allocate sites for the future provision of schools to meet the needs of local communities and enable the Council to meet its duty under the Education Act. Ongoing work is taking place to identify other potential sites for educational uses in the borough. The Royal Town Planning Institute in their practice advise 'Probity and the professional planner' state there must be safeguards put in place to protect against any questions of bias by the local authority; there must be a separation of interests; ideally, the proposals should be promoted through the local plan s that proposals are tested through independent scrutiny or that independent advice is taken. Independent sequential site reports should ideally be commissioned and sites promoted through the local plan so that they can maintain their professionalism and public confidence in the planning system. (Page 10 https://www.rtpi.org.uk/media/3974/probity-and-the-professional-planner-final.pdf)
Tim Catchpole, Mortlake with East Sheen Society	Policy 50. Education and Training (Strategic Policy)	No comment.
Max Millington	Policy 50. Education and Training (Strategic Policy)	[See comment in relation to education and school place planning, relating to Stag Brewery site, including consideration of alternative sites for location of secondary school if required]
	Creating safe, healthy and inclusive communities	
Nina Miles, GLA on behalf of Mayor of London	Creating safe, healthy and inclusive communities	The policy approaches towards creating safe, healthy and inclusive communities are closely aligned with the Mayor’s Good Growth Objective GG1, Building strong and inclusive communities.
	Policy 51. Health and Wellbeing (Strategic Policy)	
Tim Catchpole, Mortlake with East Sheen Society	Policy 51. Health and Wellbeing (Strategic Policy)	No comment.
Alice Shackleton, on behalf of The Kew Society	Policy 51 Health and well-being	Again, it is important to be inclusive of older people. Not all older people are disabled or suffering from dementia. Increasingly, older people are fit and active but not as fit as the young. They may no longer be able to walk long distances (which will be shorter than the equivalent long distance for a young person) or cycle for long distances or at all. Public transport is being reduced in the Kew area - with the reduction in bus services at Manor Circus and South West Trains reduction of service from North Sheen station. Most of Kew has a PTAL of 2 - "poor". To walk to Kew

		Gardens Station from the Kew Riverside developments or parts of North Sheen may be a short distance for a young person but may be too far for an older person to contemplate or anyone who is not so fit. These people may need to use a car to get around. They should not be excluded or just considered as an aspect of adult social care.
Laura Hutson, Sport England	Policy 51. Creating safe, healthy and inclusive communities	Sport England is fully supportive of this policy, which aims to promote healthy lifestyles and reduce health inequalities in line with our own aims. Many of this policy’s aims (sustainable travel, access to green infrastructure, access to public toilets and free drinking water in public locations) are fully in line with Sport England’s own Active Design guidance. [See also comment in relation to Uniting the Movement and Active Environments]
Jon Rowles	Paragraph 25.14	Takeaways 25.14 These types of policies have had a limited impact – and some boroughs are replacing them with ‘healthy food neighbourhoods’ & ‘School Super Zones’ and I feel that Richmond need to investigate these alternative measures.
Ben Fox, Planware LTD on behalf of McDonald’s Restaurants LTD	Policy 19. Managing impacts & Policy 51. Health and Wellbeing (Strategic Policy)	[See comment in regard to takeaways]
Ziyad Thomas, Planning Issues Ltd on behalf of Churchill Retirement Living and McCarthy Stone	Policy 51. Health and Wellbeing (Strategic Policy)	We welcome the Council’s commitment to the health and wellbeing of its residents. As detailed in our representation to Policy 12. Housing Needs of Different Groups the demographic profile of the Borough is ageing with an annual requirement of 155 units of specialist older persons’ housing per annum. An ageing population inevitably results in an increase in frail individuals and persons with long term health issues. There is a commensurate pressure on care and health services accordingly with many local authorities spending over a third of their budgets on adult social care currently. It is well established that poor housing can exacerbate health problems in old age, with enormous resultant costs to the NHS and social care. For example: Falls - Public Health England statistics show that in 2017/18 falls accounted for 335,000 hospital admissions in England of people aged 65 and over. Cold Homes - Millions of older people in the UK are living in homes that are too cold. A cold home can cause chronic and acute illnesses and lead to reduced mobility, falls and depression. Social Isolation - 1.5 million people aged 50 and over are always or often lonely, researchers have calculated. Loneliness makes it harder for people to regulate behaviours such as drinking, smoking, and over-eating, which in turn have their own significant negative outcomes. Specialist older persons’ housing has been developed with the needs of the elderly in mind, enabling them to remain independent for longer. These homes are designed to be warm and with features to alleviate the physical impact of ageing (such as level access throughout) and offer opportunities for residents to access support, care, and companionship. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year. Sub-Clause B 1. States that all new development is required to provide a Health Impact Assessment and paragraph 25.13 points developers towards the London Healthy Urban Development Unit (HUDU) ‘rapid HIA tool’. The questions in the HIA tool are heavily weighted towards strategic residential or mixed-use developments and have little bearing on smaller sites of 20-50 units. We therefore request that sub-clause B.1. is re-visited and the requirement for Health Impact Assessments is limited to relevant developments – i.e. proposals with a clear adverse impacts on the health and wellbeing (takeaways, betting shops etc.) and strategic housing developments.
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 51. Health and Wellbeing	We support the policy which reflects the Good Growth objective ‘Creating a healthy city’ (GG3) in the London Plan. We welcome the reference to the Richmond Health and Care Plan in paragraph 25.2. We suggest that an additional clause could be added to refer to housing design to ensure that new homes are healthy reflecting housing standards (Policy 13. Housing Mix and Standards) and design quality (Policy 28. Local character and design quality). The importance of housing design was noted in the Health Impact Assessment of the draft plan (paragraph 5.8). We support Clause B 1 and the requirement for a health impact assessment with all major development proposals and welcome reference to the HUDU Rapid HIA tool and the HUDU Planning Contributions Model in paragraph 25.13. We consider that Clause B 4 is not required as the loss of health facilities is addressed in the following Clause B 5 with reference to Policy 49. We note the text in paragraphs 25.17 to 25.21 which helpfully explains how the NHS is currently organised, the responsibilities of different bodies and the strategic context, including reference to the Richmond Health and Care Estates Strategy. This text will need to revised as new models of care are developed, including primary care networks and the responsibilities for the NHS estate under Integrated Care Systems become established. As a result the text in paragraphs 25.21 and 24.12 will need to be amended to clearly explain the process and responsibilities regarding the disposal of surplus NHS assets.
Tim Harrington	Omission – public toilets	My response relates to what is missing from the local plan rather than what is in it, so I cannot give detailed page numbers etc. Local provision of public toilet facilities. The pandemic has clearly shown that the old strategy of encouraging retailers and other owners of toilets to allow free public use to be one that cannot and does not work in a post covid world. The local plan needs to include where and how public provision of public toilet facilities is going to happen. For example, Richmond and Kew riversides both lack adequate public toilet provision. Richmond Green and Kew Green, Old Deer Park and many other locations within the borough lack public toilet facilities, a 20 minute neighbourhood needs to have public toilets within 20 minutes? Also with the increase in delivery drivers, it is now common place to see old bottles discarded on kerbsides filled with urine, as there is no adequate provision for delivery drivers to park and make use of a public toilet. These toilets could be provided such that a small charge via an electronic payment method could be used to fund and even make a profit from their use. Sites that could be used include the old changing rooms at Pools on the Park, next to the tennis courts, these could be dual use in that delivery drivers can park and use them and also the public and sports users can also use them. The derict toilets block on the south side of the A316 in the Old Deer Park Car park could be renovated and would be more than dual use for delivery drivers, the public and for those returning by bus from twickenham stadium on big match days. A vacant shop could be aquired within the Richmond town centre or on the riverbank to provide toilet facilities for the Green, riverside and the town centre. In Kew a vacant "under the bridge" workshop could be acquired to provide toilet facilities for the riverside, kew green and for the many fans that will leave the new brentford stadium. In Sheen the old Sheen Park cricket club building on Sheen Common could be used to provide toilet facilities for those using Sheen Common. Other areas that also need toilet provision include Ham Common and the riverside near to Ham house.
	Policy 52. Allotments and food growing spaces	
Vicky Phillips, Habitats & Heritage	Policy 52. Allotments and food growing spaces	we support the retention of all allotment sites and are pleased that they are going to be assessed as possible new SINCS. However, it should be recognised that many require considerable investment, for example in tree maintenance, maintaining paths and water supplies, introducing woody waste processing and communal composting facilities following the ban on bonfires introduced in 2019.
Tim Catchpole, Mortlake with East Sheen Society	Policy 52. Allotments and food growing spaces	No comment.
Jon Rowles	Policy 52. Allotments and food growing spaces	Only 9 of the 24 allotments are statutory – the ones that are not genuine temporary sites (like the ones on cemetery land) need to be made into statutory sites. 25.26: There is a need for new sites as there are long waiting lists for allotments with 16 sites having closed waiting lists as the projected wait is over five years. Many allotments have been subdivided from half plots (5 rods) to quarter plots (2.5 rods) which are not big enough for anything other than hobby growing and which are not large enough to enable crop rotation.

Alice Roberts, CPRE London	Policy 52 Allotments and food growing spaces	Only 9 of the 24 allotments are statutory – meaning the rest are ‘temporary’: we suggest these are all upgraded. Also, we would question that need is ‘fluctuating’ (as we understand it, the lists have been open and closed a number of times which might be leading to the appearance of fluctuations) and would recommend that a more permanent waiting list is established and advertised. Plots should not be divided when reallocated – most plots in Richmond were half plots (5 rods) but many are now just 2.5 rods which make them too small to adequately rotate crops.
	Policy 53. Local Environmental impacts	
Tim Catchpole, Mortlake with East Sheen Society	Policy 53. Local Environmental impacts	As mentioned above, this policy would sit better in the section on Local Character and Design Quality.
Michael Atkins, Port of London Authority (PLA)	Policy 53. Local Environmental impacts	Support inclusion within the policy and supporting text to the Agent of Change principle, which in line with paragraph 187 of the NPPF and Policy D12 of the London Plan, states that the Council will apply the principle, which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses firmly on the proposed new noise-sensitive development.
David Wilson, Thames Water	Policy 53. Local Environmental Impacts - Development within the vicinity of Sewage Pumping Stations (and Sewage Works) Works	<p>The new Local Plan should assess impact of any development within the vicinity of sewage works and sewage pumping stations in line with the Agent of Change principle set out in the NPPF and Policy D13 of the London Plan 2021.</p> <p>Where development is being proposed within 800m of a sewage treatment works or 15m of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works/pumping station.</p> <p>Paragraph 174 of the NPPF, February 2021, sets out that: “Planning policies and decisions should contribute to and enhance the natural and local environment by:e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans...”</p> <p>Paragraph 185 goes on to state: “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development....”</p> <p>The online PPG states at Paragraph: 005 Reference ID: 34-005-20140306 that: “Plan-making may need to consider:whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern)..”</p> <p>The odour impact study would establish whether new resident’s amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer. On this basis, text similar to the following should be incorporated into the Neighbourhood Plan: “When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.”</p>
George Goodby, Environment Agency	Part I of Policy 53. Local Environmental impacts – Part I in relation to waste management	<p>Part I of the above policy refers to responsibility of developers to protect occupiers from existing sources of poor air quality and excessive noise. As waste sites can often be sources of poor air quality and excessive noise we welcome this position. We however would like this to be expanded upon to include more details on developer’s requirements and for any waste sites specifically to be mentioned.</p> <p>The Environment Agency is having to respond to an increasing number of complaints surrounding poor air quality (usually dust) and noise at safeguarded waste sites throughout London from occupiers of new developments which have been constructed near to these existing sites. Whilst there is often a requirement for poor air quality and excessive noise to be mitigated by the operators of these sites, sometimes it is not possible to mitigate to the point of eradicating the problem. Furthermore, if the Environment Agency continues to encounter poor air quality and excessive noise at waste sites located near to new developments, then in extreme examples enforcement action might become the only course of action which can be taken. Enforcement action could subsequently affect the long-term future of safeguarded sites as waste permits might have to be suspended or revoked. Requiring developers to incorporate designs which mitigate poor air quality and dust would therefore be beneficial for both occupiers and existing waste sites and would reduce the regulatory load on the Environment Agency.</p>
George Goodby, Environment Agency	Policy 53: Local Environmental Impacts – Point K, Point N in relation to biodiversity	<p>Point K – Light Pollution, Part 1 should include a more precise definition of “receptors”. Ecological receptors, such as bats, are particularly sensitive to light pollution so a requirement for an ecological assessment of the impact of light spill into wildlife corridors, such as rivers, should be included under this policy point.</p> <p>Point N- Construction and Demolition, Part 3 – we would welcome the inclusion of clarification that “sensitive receptors” includes rivers and the habitat they support.</p>
George Goodby, Environment Agency	Groundwater and Contaminated Land	<p>The emerging Local Plan can help to ensure that groundwater is protected and where necessary improved during regeneration and development. Contamination in or on land can present unacceptable risks to human health and the wider environment, including to groundwater. Land contamination is often caused by previous uses such as former factories and mines, as well as new development such as petrol filling stations and cemeteries. Land contamination, or the potential for contamination, is a material planning consideration.</p> <p>Land contamination can adversely affect or restrict the beneficial use of land. Often development presents the best opportunity to successfully deal with these risks. The Local Plan therefore has a key role to play in facilitating the improvement of land affected by contamination. The Water Framework Directive and the Groundwater Daughter Directive set out objectives for groundwater including aiming for good chemical and quantitative status; no upwards trends in pollution; and preventing or limiting the entry of certain substances to waterbodies. The council must have regard to these objectives and therefore should ensure their decisions help achieve these goals. Dealing with land contamination can help contribute to achieving the objectives of the Water Framework Directive.</p> <p>Groundwater is constantly moving and once contaminated it can take a very long time to recover if at all. Therefore, the overarching approach to groundwater protection needs to be considered at the strategic planning stage. The Local Plan should identify sensitive groundwater areas along with policies for alternative approaches, such as cross boundary discussions with neighbouring LPAs, Environment Agency (where source protection zones straddle boundaries) and Water Companies.</p> <p>The outcomes we want to see:</p> <ul style="list-style-type: none">• Groundwater is protected and improved for the benefit of people and the economy• Future developments are in appropriate locations where pollution and other adverse effects on the local environmental or amenity value are minimised.• Local plan policies and strategies help to ensure that developing land affected by contamination won’t create unacceptable risks or allow existing ones to continue.• Land is managed sustainably, protecting soils and water and contributing positively to reducing the impacts of and adapting to climate change. <p>The London Borough of Richmond overlies the London Clay bedrock formation (classified as unproductive strata), with superficial deposits comprising of the Kempton Park Gravel, Taplow Gravel, Black Park Gravel, Alluvium, Head and Langley Silt Member. Any pathways for contamination must be strictly controlled to avoid pollution of the Principal and Secondary aquifers from any historic contamination identified on the site from previous uses. We can confirm that, from reviewing the list of 37 proposed redevelopment sites identified within the Local Plan, none of which lie within any Source Protection Zones.</p>

George Goodby, Environment Agency	Groundwater Protection	Proposals for Sustainable Drainage systems involving infiltration must be assessed and discussed with the Environment Agency to determine their suitability in terms of the impact of any drainage into the groundwater aquifer. Any developments with proposals for piled foundations must take account of disturbance of any ground to cause turbidity in water supply and to prevent creating pathways for contamination materials to reach the groundwater beneath any sites impacted by contamination or landfill.
George Goodby, Environment Agency	Contamination	<p>Development proposals (such as those reviewed in Sections 5-14) that would enable contaminated sites to be brought into beneficial use will normally be permitted, so long as the sites can be rendered suitable for the proposed end use in terms of the impact on human health, public safety and the environment, including underlying groundwater resources. Key sites listed within the Local Plan include Sites 5 and 29 (the two Sainsbury’s car park with associated petrol filling stations) in Hampton and Richmond; Site 13 which is located in close proximity to a historic landfill to the east/north east; and Site 31 the Biothane Plant in Kew.</p> <p>Such identified developments on land known or suspected to be contaminated or likely to be adversely affected by such contamination will only be permitted where:</p> <p>1) An appropriate site investigation and assessment (agreed by the Council) has been carried out as part of the application to establish whether contamination is present and to identify any remedial measures necessary to ensure that the site is suitable for the proposed end use;</p> <p>2) The proposed remedial measures would be acceptable in planning terms and would provide effective safeguards against contamination hazards during the development and subsequent occupation of the site.</p> <p>Planning conditions will be attached to any consent to ensure that remedial measures are fully implemented, before occupation.</p> <p>We recommend that the applicant:</p> <ul style="list-style-type: none">• Refers to the Environment Agency Land Contamination Risk Management guidance (LCRM);• Uses BS 10175:2011+A2:2017, Investigation of potentially contaminated sites – Code of Practice as a guide to undertaking the desk study and site investigation scheme;• Uses MCERTS accredited methods for testing contaminated soils at the site; and <p>Consult our website at www.environment-agency.gov.uk for further information about any permissions that may be required.</p> <p>We welcome the inclusion of Part M of Policy 53. Local Environmental impacts addressing the requirement for development to remediate any potential contamination and to properly consider the risk associated. However, we would welcome stronger and more clearer wording within this policy unit to clarify what is required both in terms of assessment and suitability when it comes to any proposed development. We would recommend that reference is made to NPPF paragraph 183 and 184 which further outlines the requirements to deliver development identifying and addressing any potential risks. The Environment Agency will object to development on brownfield land where the principles of NPPF are not being applied at the planning application stage. The risks to the environment should be fully assessed during any site investigations.</p> <p>The Local Plan should ensure the evidence base takes a risk-based approach to defining contaminated land by identifying the source-pathway-receptor (contaminant linkages). This should inform the council where Preliminary Risk Assessment (PRA) is required.</p> <p>We would welcome policies which require developers to submit a PRA together with a planning application where land is potentially contaminated. Policies should require developers to submit a PRA together with a planning application where land is potentially contaminated.</p> <p>For potentially contaminated land;</p> <ul style="list-style-type: none">• Policies should require developers to ensure sites are suitable or made suitable for the intended use• Policies should require developers to prevent discharges to ground through land affected by contamination• Policies should encourage the implementation of measures that prevent contamination being activated or spread when development takes place for any land which is affected by contamination.• Policies should link to and promote relevant guidance such as the risk management framework provided in the CLR11, Model Procedures for the Management of Land Contamination: https://www.gov.uk/government/publications/managing-land-contamination• Provide and encourage the council to use our evidence, information and advice (maps and descriptions showing geology, hydrogeology and the location of source protection zones (SPZ)). <p>We will provide the council with advice and support:</p> <ul style="list-style-type: none">• Where strategic sites are proposed in Source Protection Zones 1 or near to sites regulated by the EA, including areas where we are likely to object to certain activities that could damage or diminish groundwater resources.
Suzanne Parkes, Elmbridge Borough Council	Policy 53. Local Environmental impacts - Natural environment	We support Policy 53 ‘Local Environment Impacts’ and how the council will seek to minimise impact on the environment. The policy aims to protect and enhance the natural environment through a range of ways set out in the document. We do recommend that there should be greater emphasis and connection with Policy 53 and Policy 3 ‘Tackling the climate emergency’ (strategic policy). It is expected that increased development will impact Air Quality in the Hampton Court area and principally affecting the aims of tackling climate change. Again, we look forward to our continued discussions as our respective Local Plans progress.
	Policy 54. Basements and subterranean developments	
Tim Catchpole, Mortlake with East Sheen Society	Policy 54. Basements and subterranean developments	Item B.5 needs to be modified to: “demonstrate that the scheme will not <i>puncture or degrade a sealed or isolated aquifer</i> or increase or otherwise exacerbate flood risk.” As mentioned above, this policy would likewise sit better in the section on Local Character and Design Quality.
David Wilson, Thames Water	Policy 54 - Basements – Sewage flooding	Thames Water’s main concerns with regard to subterranean development are: 1) The scale of urbanisation throughout London is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water’s sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network. 2) By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows. The policy should therefore require all new basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. Clearly this criterion of the policy will only apply when there is a waste outlet from the basement i.e. a basement that includes toilets, bathrooms, utility rooms etc. Applicants should show the location of the device on the drawings submitted with the planning application.
	Delivery and Monitoring	
	Policy 55. Delivery and Monitoring	
Theresa Oddelm, The Royal Parks	Policy 55 Delivery and Monitoring	In terms of size and value, The Royal Parks are key features of the Borough which provide open space for residents, workers and visitors. It is therefore important that some of the value of development in the Borough helps to support the maintenance, management and protection of Parks which will come under increasing pressure over the Plan period. We would like to work with the Council to achieve this.

Tim Catchpole, Mortlake with East Sheen Society	Policy 55. Delivery and Monitoring	No comment.
Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 55. Delivery and Monitoring	We welcome the policy, but the clauses under the ‘Infrastructure’ heading do not refer to social infrastructure and as such the policy does not reflect the requirements in Policy 49. Clause D states that the Council will require planning obligations to mitigate any adverse impact from a development. However, neither the policy or supporting text refers to the Planning Obligations SPD (June 2020) and the requirements for each type of infrastructure. Paragraphs 24.3 and 26.1 mention that the Council intends to update the Infrastructure Delivery Plan in 2022 and the CCG would welcome the opportunity to contribute to the update so that it reflects the Richmond Health and Care Plan and Richmond Health and Care Estates Strategy.
	Appendices	
Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	OMMISSION - Glossary	It is noted that there is no glossary to the Plan except in respect of energy, carbon etc on page 144. In the absence of a Glossary it should be noted that the definitions/glossary set out in NPPF will be applicable.
Graeme Fraser-Watson, The Teddington Society (Planning Group)	Glossary	The draft local plan is full of acronyms and phrases that are not generally understood. It would be very useful to have a glossary provided in any future publication. We hope that you are able to take these views into account in the final new Local Plan.
	Appendix 1: List of Key and Secondary Shopping Frontage	
	Appendix 2 Marketing Requirements	
	Appendix 3:Tall and Mid-Rise Building Zones	
Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Appendix 3 (Tall and Mid-rise Building Zones)	The content of Appendix 3 (including specifically 27.25-26 – Kew Retail Park) should be updated to account for our comments set out in Section 2, including with respect to the extent of the tall and mid-rise building zones and the stated appropriate heights. [See comment in respect of the Urban Design Study]
Peter Eaton	Policy 45 Tall and Mid-Rise Building Zones & Appendix 3 - 27.27	<p>The last to bullet points relate to Policy 45- Tall and Mid-Rise Building Zones and the Urban Design Study 2021 - (UDS)</p> <p>Here the first of these two last bullet points correctly refers to a maximum building height of 7 storeys - defined in 27.27 as (21m). However, in the UDS there are three locations where there is inconsistency which requires correction.</p> <ul style="list-style-type: none">- Firstly on Pg 317 the appropriate building height range shows 7 to 8 storeys - 21-24m for the Stag site. This should be 7 storeys and clearly defined as a maximum height.- Secondly in A.5.1 on Pg 340 - there is reference to 7-8 storeys (21-24m) as an appropriate height. This should be corrected for consistency - as maximum 7 storeys (21m). - (General correction - On the same page Fig 446 refers to - A view along Ship Lane, to the locally listed Tapestry pub. The view is of the Jolly Gardeners pub).- The definition of Tall Building Zones and Mid-Rise Building Zones are illustrated for the Stag site on Fig.445 on pg 340. This is shown in more detail in Regulation 18 under diagrams/text 27.27 and 27.28 in Appendix 3. Here the zones illustrated as a series of 'contours' shaded in darker and lighter salmon colour tones: the darker being the highest- 7 storeys, and the lighter the range from 5-6 storeys - (15-18m). The higher zone is shown running through the central core of the site which generally accords with wording in the Planning Brief for the site - SPD 2011. However, the definition of where 5-6 storeys might be acceptable is far too broad reaching and does NOT accord with the wording of the SPD and in particular Clause 5.31 which requires buildings to diminish in height and scale towards the perimeter of the site or along the Riverside. A reduction from a maximum of 7 storeys to 5/6 is not sufficient in the locations shown by the contours. Given that the maximum height should be 7 storeys then the colour contours for buildings of 5-6 storeys ought to be defined further back from the site perimeter and riverside. The proposed contour plan should be amended to pull back the 5-6 storey zone from the perimeter and particularly the riverside. At present it could be interpreted that buildings up to 6 storeys would be acceptable at the perimeter and along the riverside but this would be excessive and harmful to the Arcadian Thames context, the towpath, and general 2/3 storey character of the surrounding area. It also represents too tight a range between tall and mid-rise on this particular site.- Given the scale of the Stag site - 22 acres - it would be appropriate for diagrams 27.27 and 27.28 to be enlarged for clearer definition of the zones given the above comments.
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	High rise development	[See comment in respect of high rise development and comment in respect of Policy 45]
Peter Willan and Paul Velluet, Old Deer Park Working Group	High rise development	[See comment in respect of high rise development and comment in respect of Policy 45]
Louise Fluker, The Richmond Society	Policy 45 Tall Buildings page 273-4 and Appendix 3 - 27.21 Richmond Station: Tall Building Zone Appropriate height: 7-8 storeys (21-24m) and 27.22 Richmond Station: Mid Rise Zone Appropriate height: 5-6 storeys (15-18m)	as stated above [See comment against the place-based strategies] we do not consider the area around Richmond Station as appropriate for Tall buildings (in excess of 7 storeys or 21 metres. Even mid rise buildings will be taller than current buildings
James Sheppard, CBRE, on behalf of LGC Ltd	Urban Design Study - LGC site	<p>6. Urban Design and successful placemaking</p> <p>The critical business and commercial imperative to develop a new modern, fit-for-purpose home for LGC in Teddington has led to LGC, in tandem with a plan-led approach, to explore pre-application meetings with the Council, presenting illustrative layout and design proposals for discussion purposes. These initial designs demonstrate that a net-gain in employment floorspace can be delivered on the LGC site, whilst simultaneously providing homes and a policy compliant level of much needed affordable homes.</p> <p>Crucially, these aspirations can be delivered in a sensitive form that fully considers the surrounding urban design context. The site is wholly inefficient and there is an opportunity for the Council to support the site’s comprehensive redevelopment, meeting a range of policy aspirations, in a considered form. Through technical assessment, including townscape, a range of low-mid height buildings of high-quality can be delivered.</p> <p>The place-based strategy for Teddington and Hampton Wick, as presented in the Urban Design Study (2021), confirms the area as being home to significant assets in the science and life sciences sectors, including LGC, with the proximity of Teddington town centre and railway station providing good transport links into central London.</p> <p>The Urban Design Study designated the site within Character Area B2 – Teddington Residential (sub-area B2a).</p> <p>The character area appraisal within the study broadly comments that the Teddington Residential area has a high sensitivity to change. Notably however, the appraisal confirms negative qualities that do not contribute to the character of the area. Primarily, it has been assessed that the large, gated complex of the National Physical Laboratory (including LGC) has a negative impact on the</p>

		<p>adjacent Coleshill and Blandford Roads, with metal fencing and blank facades. It was also commented that there a lack of incidental green space in the locality. The urban design quality of the site and surrounds of LGC can therefore be demonstrably improved through considered redevelopment. Through initial illustrative designs there is an opportunity to provide those incidental, publicly accessible green spaces, whilst opening the site up, becoming outward facing, connected with its surroundings and enhancing permeability through the site.</p> <p>The B2 character area appraisal concludes by noting “the coarser urban grain and existing taller buildings in the area around the National Physical Laboratory (sub-area B2a) provides potential opportunity to accommodate development or intensification whilst addressing and improving some of the negative qualities”.</p> <p>It follows therefore that although most of the borough is characterised by areas that have a high degree of sensitivity to change, the LGC site is one of the few areas that can accept change. It is strongly considered that any change through redevelopment in this sub-area, could be progressed in a form that is highly beneficial to the urban design context.</p> <p>It is in this vein that we strongly consider that the site is appropriate for designation as suitable for ‘mid-rise’ buildings. It is acknowledged that the site’s location and proximity to sensitive landscapes, such as Bushy Park to the South, would preclude the site from being suitable for tall buildings. However, given the site’s only ‘moderate sensitivity’ to change, we would strongly advocate that sub-area B2a should be assessed in more detail as part of the Local Plan’s evidence base, with a view to including it as a ‘mid-rise building zone’. Mid-rise buildings are defined in the draft Local Plan under draft Policy 45, as being “buildings which do not trigger the definition of a tall building but are 5 storeys or over (up to 6 storeys), or 15 metres or more from the ground level to the top of the building (whichever is lower)”.</p> <p>Any future proposed redevelopment of the site for mixed-use, as demonstrated through an evolving illustrative masterplan for the site, as presented to Council officers, could fulfil the criteria as set out in draft Policy 45c. Mid-rise buildings could be carefully located and designed to step down to surrounding existing and proposed buildings, namely Coleshill Road and Queens Road; would respond positively and protect the setting of existing buildings including heritage assets; respect the scale, width and proportion of adjacent streets and valued features; and deliver a varied and interesting roofline.</p> <p>It is noted that draft Policy 45d, makes an allowance for mid-rise buildings outside of the identified mid-rise building zones where they are within or adjacent to areas which include buildings taller than the prevailing height. However, given the site’s assessed moderate sensitivity to change, we advocate for its inclusion as a mid-rise building zone. Indeed, draft paragraph 22.26 concedes that further suitable sites for mid-rise buildings may become available, particularly those sites which allow for a comprehensive scheme with mid-rise at its centre while still integrating well with the locality, with lower height at the periphery to avoid imposing negatively on the surroundings.</p> <p>In addition to the above, the conclusions reached in section 4.2 of the Urban Design Study, state that the LGC site has been assessed as having a relatively ‘low probability of change’. Through continued dialogue with the Council, it has been documented that the LGC site is no longer fit for purpose, is wholly inefficient and ineffective, and must change in the shorter term to ensure business and scientific needs are met into the future. As such, we would recommend the probability of change is increased to ‘high (shaded green)’.</p> <p>We respectfully request that the Council specifically assess and consider in more detail the LGC site’s potential to be designated as a ‘mid-rise building zone’ given its suitability and moderate sensitivity to change.</p>
Catherine Rostron	Place-based strategy for Kew – Kew Retail Park, Kew Biothane	[See comments in relation to height on site allocations in Kew]
Graeme Fraser-Watson, The Teddington Society (Planning Group)	Place-based Strategy for Teddington & Hampton Wick	[See comment in relation to mid-rise buildings in Teddington]
Christine Duke	Site Allocation 12: The Stoop (Harlequins Rugby Football Club), Twickenham	[See comment in relation to the mid-rise building zone at Site Allocation 12]
Marie Lewis	Urban Design Study - Homebase, Manor Road, East Sheen	[See comment in relation to the tall and mid-rise building zones on the Homebase site against Site Allocation 28]
	Appendix 4: Review of Sites of Importance for Nature Conservation	
Unity Harvey	Appendix 4: Review of Sites of Importance for Nature Conservation, Page 336: Barn Elms	<p>a. would like to add the area of <i>Shadwell Pool from Queen Elizabeth Walk to Beverley Brook as a vital and essential area for nature conservation</i>. It has much protected wildlife like bats in its own right but is also the only over-land wet area to and from the London Wetland Centre from Surrey via Richmond Park Roehampton Golf Club and Barnes Common. The LWC is built up on its other 3 sides...</p> <p>b. <i>The strip of grass between the Wandsworth Tennis courts and the Richmond Playing Field copse belonging to Wandsworth</i> also used to have special status to protect the wooded copse but this status was removed some years ago. Please could it be protected again to prevent car and boat parking; waste bins and rubbish being placed on it.</p> <p>c. Please could you ensure that 1. the <i>no floodlighting on Barn Elms</i> regulation remains and 2. also <i>address the issue of increasing numbers of mobile lights</i>. They are already on Rocks Lane Sports Centre narrowing the wildlife run, Enable Wandsworth Sports Centre between the copse and Beverley Brook, Richmond Playing Field Tennis Courts and the London Wetland Centre. I feel that it is only a matter of time before the Enable want mobile lights on their tennis courts too. This patchwork of lights effectively blocks the north/ south wildlife corridor. Insect life is at its peak for the first hour after sunset just when the lights are switched on so they seriously affect the food supply for nocturnal creatures.</p>
Hilary Pereira, River Thames Society	Appendix 4 - Maps, on pages 336 and 339	Responsibilities over river-related matters are not immediately obvious, and it is unhelpful for official documents to be inconsistent. The maps on pages 336 and 339 of this consultation plan draw the Borough boundary to exclude the water space, which is incorrect. Whilst some of the Council’s powers do not apply in/over the river, it is still the responsible borough when its territory includes the bank either all the way across or to the agreed boundary line with another Local Authority. These charts need to be corrected [within appendix 4 on pages 336 and 339].
Dilys Walker	Paragraph 21.62, Policy 39 Biodiversity and Geodiversity, Places: Teddington and Hampton Wick, map of Richmond SINC’s in Section 27 Appendices: Appendix 4 , site 50 ref: RiB 32 Udney Park	<p>RiB 32 New SINC proposal for Udney Park Fields is fully supported by my family who live on the boundary of a Udney Park Fields. The fields are an important corridor of green space for wildlife as well as an important space for sports play. Biodiversity studies show it has varied wildlife - in particular bat species. It has been partially rewilded since the reduction in number of sports pitches. Wild plants and animals are returning to the green space. It is a calm and much needed green space and Site of a nature conservation for the local community to enjoy. It is also an important surface drainage area and carbon capture as it rewilds.</p> <p>I fully support the review of site ref RiB32 for inclusion in the plan as a Site of Important Nature ConServation (SINC). The fields are an important corridor of green space for wildlife as well as an important space for sports play. Biodiversity studies show it has varied wildlife in particular - several species of bats and other animals and insects. Since the reduction in sports pitches the field has partially rewilded and many wild plants and animals are returning. It is a calm, much needed and much loved local space for surrounding dwellings and the wider community. It is also important for surface drainage and as an area of carbon capture as it rewilds.</p>
K Peachey	Para 27 Appendix 4	<p>27 Appendix 4</p> <p>I fully support Udney Park being designated as a SINC so that biodiversity can be maintained and enhanced. This site hosts multiple and protected species and acts as a connecting habitat for flocks of birds and more local wildlife. Sadly, it’s earlier status of OOLTI did not prevent some destruction of mature habitat, including tree felling and hedgerow removal.</p>
Mark Jopling, Udney Park Playing Fields Trust	Udney Park Playing Fields	The Local Plan Pre-Publication Version also includes for the first time Udney Park as a Site of Borough-wide Importance for Nature Conservation, a designation we fully support and which is consistent with public access and use of Udney Park as a community playing field. Udney Park is a critical habitat as part of the local ecology network of SSSIs and home to at least 9 protected species as identified by ecology experts.

Katarina Hagstrom	The Review of Sites of Importance for Nature Conservation and Addendum - Site name: Udney Park, Site ref: RiB32	<p>I support the designation of Udney Park as a Borough Grade SINC. The evidence base supporting this designation is overwhelming. It includes:</p> <p>(1) Bat surveys onsite in 2016-2017 recorded “<u>at least 8 different species of bats</u>” (emphasis added). The survey report <u>names 9 species</u>: “Species of bats recorded during the surveys included common pipistrelle, soprano pipistrelle, nathusius pipistrelle, noctule, leisler, serotine, brown long-ear and myotis species (possibly brandts and daubentons).” Ref: Peach Ecology, Phase 2 Bat and Reptile survey report, 11 July 2017.*</p> <p>(2) Bat surveys onsite in 2019 “recorded similar species of bats, <u>at least 8 different species</u>” (emphasis added) with the survey report <u>naming the same 9 species</u>, noting “the exact myotis species was not confirmed although it is considered likely that the recordings were Brandt’s and/or Daubenton’s”. Ref: Peach Ecology, Update Bat Activity Survey Report 2019, 3 October 2019.*</p> <p>(3) The Richmond Bat Species Action Plan steering group has noted: “The site has <u>high species richness</u>, with eight bat species recorded during the surveys carried out by Peach Ecology & Environmental Services in 2017. This included records of <u>species of conservation concern</u> in London: - brown long-eared bat - the borough of Richmond is one of the few places in London with a concentration of records (London Bat Group 2015); this species if very light-shy and the protection of dark wildlife corridors is key to its survival - serotine - also has a sporadic distribution across London (London Bat Group 2015) and it appears to be declining in the borough of Richmond - over 20 years of bat monitoring at the London Wetland Centre a steep declining trend has been recorded to the extent that it has virtually disappeared from the site (Mayfield et al, 2017) - noctule - this species has shown a very steep decline over 20 years of bat monitoring at the London Wetland Centre (Mayfield et al, 2017) and a similar trend was shown at the Greater London scale from 1997 to 2006 (Briggs et al, 2007) - two species have been recorded (Leisler’s bat and Nathusius’ pipistrelle) whose population size in the UK is uncertain (Mathews et al 2018). The borough of Richmond appears to be an important locality for both species, at least within a London context (London Bat Group 2015). The site is <u>part of a network of green spaces connecting two important bat habitats</u>, Bushy Park and the river Thames. It is <u>vitaly important to maintain these wildlife corridors</u> which are constantly under threat and gradually disappearing.” (emphasis added). Ref: Richmond Bat Species Action Plan steering group submission to Consultation on designation of Udney Park Playing Fields as Local Green Space, 4 April 2019.*</p> <p>(4) For the Planning Inquiry in 2019, Peach Ecology assessed Udney Park as meeting some criteria for a Site <u>Metropolitan Importance</u> for Nature Conservation (SMINC) designation: “The site currently <u>meets some of the SMINC criteria</u> (most <u>notably species richness and important populations of species</u>).” (emphasis added). Ref: Peach Ecology, Ecology Proof of Evidence, 7/10/2019.*</p> <p>(5) For the Planning Inquiry 2019, Dr. Sarah Cox (CEcol, CEnv) evaluated the Udney Park Bat data “in line with best practice (Wray et al. 2010 (Appendix A) and CIEEM, 2019).”: “This method aims to provide a structured, transparent and repeatable framework within which the importance of bat assemblages and roosts can be assessed in line with established guidelines for Ecological Impact Assessment (CIEEM, 2019). In the case of foraging/commuting the aim is to distinguish between different intensities of use or behaviour. Of particular relevance is that this assessment must be considered within the context of the wider landscape (i.e. desk study data provided by GiGL). I agree with The Council’s case that an assemblage of at least eight species... ...presents an important local assemblage. The context for this being that the Barnes Wetland Centre SSSI and Local Wildlife Site (Site of Metropolitan Importance) support seven species. <u>Given that Udney Park provides functional connectivity with the wider landscape and supports at least eight species, current Ecological Impact Assessment (EclA) guidelines</u> for (CIEEM, 2019) are clear in that a precautionary approach to evaluation must be applied. The site would, consequently, be evaluated <u>at least at the borough scale</u>.” (emphasis added). Ref: Dr. S. Cox, Proof of Evidence on Ecology Matters, 8/10/2019.*</p> <p>(6) Natural England has noted the significance of Udney Park: “We are keen to underline that areas such as Udney Park are significant in a number of ways in relation to Natural England’s remit. The area holds a range of ecological interests of particular note the bat species (8 in total) that use the area for commuting, foraging and roosting. Taken more strategically green open space such at this plays a <u>significant role in the provision of a mosaic of linked and related greenspace</u> across the area that serve a range of important functions both for wildlife and people. (Bushy Park, the river corridor, Richmond Park and a range of additional <u>greenspaces including Udney Park act as important ‘stepping stone’ sites for wildlife</u>). Access to nature for local communities, climate change adaptation benefits, intrinsic biodiversity value are all important elements at this site...” Ref: Natural England, Response to Richmond Local Plan Proposed Main Modifications, 5 April 2019.*</p> <p>(7) The Ecological appraisal from 2016 notes: “the hedgerows are more than 20 m long, contain 80% native species and are therefore considered as UK BAP habitat”. Ref: Ecological Appraisal, Lindsey Carrington Ecological Services, March 2016.*</p> <p>(8) In addition to the species noted in the Local Plan Addendum 16/12/21, item 1, table 59, further Protected and Priority species recorded at Udney Park include: Redwing, Starling, Mistle Thrush; Dunnock, Grey Heron, Stock Dove, Goldcrest, Tawny owl; common toad; Jersey Tiger moth, White Ermine moth, Shoulder-striped Wainscot moth, Cinnabar moth. Ref: records provided for Local Plan Review 2021 Note: *Reference documents from LBRUT 18/0151/FUL Planning Application/ Planning Inquiry or Local Plan LGS assessment for Udney Park.</p>
Vicky Phillips, Habitats & Heritage	New Sites of Importance for Nature Conservation	we support the new designations and changes suggested in Appendix 4, including the recognition of Udney Park Playing Fields in Teddington as a Site of Borough Importance for Nature Conservation.
Ian Anderson, Lichfields on behalf of David Lloyd Leisure Ltd (David Lloyd)	Policy 39 – site specific SINC designation	<p>The David Lloyd site is historically set within an ‘Other Sites of Nature Importance’ (OSNI).</p> <p>Supporting evidence to the new draft plan notes previous versions of Local Plans and their associated Policies Maps have identified Other Sites of Nature Importance (OSNIs) as those sites which have either been classified as having importance for biodiversity or have the potential to have biodiversity.</p> <p>We note that the Plan and evidence base proposes that the OSNI site terminology is being updated as part of draft Plan and brought in line with the London Plan; such that these sites are now be identified as Sites of importance for Nature Conservation (SINCs).</p> <p>The evidence base includes the Salix Ecology Review of Sites of Importance for Nature Conservation in Richmond upon Thames (November 2021). This Supporting evidence notes there is limited access to David Lloyd, golf club and allotments, albeit there are public footpaths through the area. The David Lloyd is excluded from the SINC.</p> <p>Appendix 4 of the draft Plan contains a plan illustrating the sites of nature conservation, including the Fulwell and Twickenham Golf Course (13). An extract of this is contained below.</p> <p>This Plan confirms the whole of the David Lloyd, its car park and tennis / external areas (in grey) excluded from the nature conservation designation: a position which we would support.</p>



Work undertaken on behalf of the Council as background to the Review of Sites of Importance for Nature Conservation in Richmond upon Thames (Volume 2): Supporting information Produced for the London Borough of Richmond upon Thames November 2021 further summarises RiB07 in plan form, extract below.

This confirms the David Lloyd Club, its car park and tennis court are removed from a nature conservation area designation area, and moreover confirms the land to the south of the club of neutral grassland, confirming the Salix Ecology work. Given this forms part of the golf practice area we dispute this is ‘semi-improved’ given it is regularly cut to facilitate its use by the Club.

Having regard to this, we consider this element of the proposals can also be removed from the SINC, in it providing very little contribution to the SINC designation.

The SINC boundary around and excluding the club should therefore be re-drawn to exclude that area indicated orange in the below plan.

RiB07 Fulwell and Twickenham Golf Courses

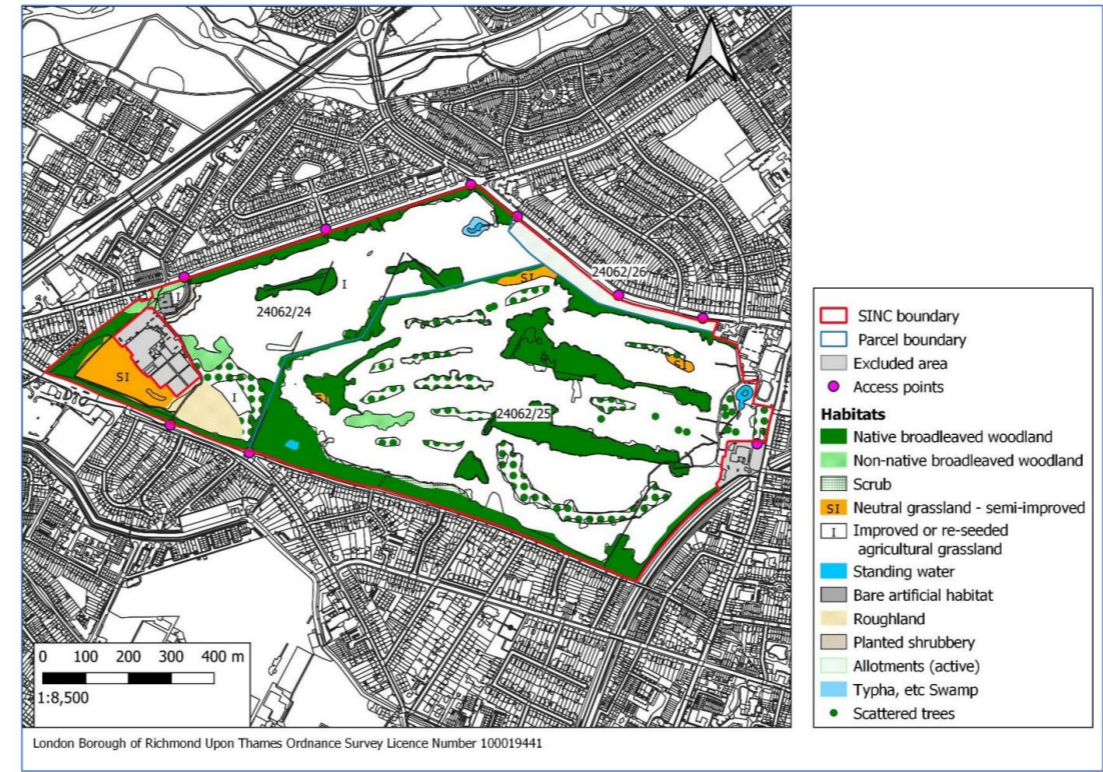


Figure 41: Fulwell and Twickenham Golf Courses

We support the addition of the new Sites of Importance for Nature Conservation, the proposed expansions of existing SINC, and the upgrading of SINC from Local to Borough importance. In particular we welcome the upgrading of Twickenham Junction Rough to Borough Grade SINC and of Portlane Brook and Meadow to Metropolitan Grade SINC. We support all of the Candidate SINC, in particular Kneller Gardens, the Twickenham Bridge, Marsh Farm and Hatherop Road Allotments, Challenge Court Open Space and Kneller Hall. We would ask the Council to give serious consideration to the way in which appropriate public access could be secured for as many of these new SINC as practical.

The recommendations listed below are included within the report and impact on sites managed by The Royal Parks. We have commented accordingly beneath the quoted paragraphs highlighted in *italics*.

M082 Richmond Park and Associated Areas:

We have comments relating to the following two paragraphs:

5.3.10 Add in additional land, including areas of amenity grassland and a small allotment at Palewell Park to ensure continuity of Semi-natural habitat and a wildlife corridor to the Beverley Brook SINC. Include additional areas at the Richmond Park Golf course as a buffer/additional semi-natural habitat to the site.

5.3.11 adjust the site boundary adjacent to Petersham Meadows.

It is assumed that the 'additional areas at the Richmond Park Golf course' comprise the two small Expansion areas on the eastern boundary of the site. Please note that these comprise: an existing overflow car park to the adjacent Roehampton Gate car park (which is included within the existing SINC boundary); and an existing golf driving range largely comprised of closely mown grassland and boundary scrub.

On the assumption that inclusion of these areas within the SINC boundary will not preclude the existing use explained above, there is no objection to these proposals. Other extension areas are on land outside of TRP control.

M084 Bushy Park and Home Park

		<p><i>5.3.13 Incorporate National Physical Laboratory (NPL) land into the SINC. NPL land holdings include extensive areas of acid grassland, a habitat of Principal Importance. Whilst this is currently closely mown, a change of management of selected areas to enhance this habitat may be possible. There is a large area of unmanaged woodland with mature oaks. Although there is understory of rhododendron and other non-native invasive species, restoration to parkland or native woodland habitat is feasible.</i></p> <p>The habitats located within this area warrant their inclusion in the SINC boundary. There is no objection to these proposals.</p> <p><u><i>RiB06 Longford River in Richmond</i></u></p> <p><i>5.3.17 Pantile Bridge Open Space, at the junction of Uxbridge Road and High Street Hampton Hill to be added to the existing SINC. Whilst not of high nature conservation value, this small area of amenity grassland acts as a buffer to the SINC.</i></p> <p>There is no objection to these proposals which would provide a buffer to the Longford River.</p>
David Wilson, Thames Water	Policy 39 Biodiversity - M085 Hampton Water Treatment Works and Reservoirs Nature Conservation Designation	<p>In the Review of Sites of Importance for Nature Conservation in Richmond upon Thames, it is recommended that Hampton Water Treatment Works (WTW) SINC is upgraded to a Site of Metropolitan Importance and amalgamated with Stain Hill and Sunnyside Reservoirs to create ‘Hampton Water Treatment Works and Reservoirs’ Site of Metropolitan Importance.</p> <p>Hampton WTW is a key operational site which should not be unduly constrained by additional planning designations. It is considered that the proposal to upgrade the WTW to a site of metropolitan nature interest is flawed based on the presence of all of the WTW infrastructure development on the site similar to industrial processes and that the proposed upgrade is not evidenced from site surveys. The reservoirs identified are part of the water treatment process and are not suitable for the creation and enhancement of new habitats, as it is important that they are able function fully in line with operational requirements. Furthermore, the full developed Hampton WTW site is also proposed to be included, which is anomalous as it is a developed site with buildings, roads and hardstanding, and no natural/green space. The assessment of the site sets out ‘potential’ to improve biodiversity conditions. These suggestions of reduced mowing is considered to be fundamentally incompatible with the operation, as there are clear justifications for mowing the grass in operational areas, as it is important for the inspection and identification of any risks or structural issues.</p> <p>Thames Water has strong commitments to biodiversity to its regulator, Ofwat, which includes identifying Sites of Biodiversity Interest where biodiversity can be enhanced at specific sites without affecting operations.</p> <p>Whilst certain areas may be temporarily not be in use they are retained for future operations and will be key to London’s ongoing water supply improvements.</p> <p>We therefore object to this proposal to upgrade the nature designation.</p>

Appendices:

1. Hannah Gray, Avison Young on behalf of National Grid
2. David Wilson, Thames Water
3. Vincent Gabbe, Knight Frank, on behalf of Harlequin Football Club Limited
4. Emma Penson, DWD on behalf of Dukes Education Group and Radnor House School Limited
5. Marie Lewis
6. Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer
7. George Goodby, Environment Agency
8. Ben Fox, Planware LTD on behalf of McDonald’s Restaurants LTD
9. Faye Wright, Forward Planning and Development on behalf of BMO Real Estate
10. James Sheppard, CBRE, on behalf of LGC Ltd
11. David Taylor
12. Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)