



Other comments received not relating to Proposed Main Modifications to the Local Plan
www.richmond.gov.uk/draft_local_plan_examination#proposed_main_modifications_consultation
Consultation from 31 January until 17 March 2025

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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; they follow the Plan order. Comments have been moved/grouped so that common points are viewed together.
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 with full clarity within the main Schedule. The officer references added are shown in the Schedule as *[See Appendix....]*
This schedule includes responses received during the consultation period but which are not relating to Proposed Main Modifications, which have been collated and provided to the Inspectors for information only. There is a separate schedule of all the comments received relating to Proposed Main Modifications.

Comment No.	Respondent name	Representor ID (from Index of all respondents to the Publication Plan consultation)	Part of plan commenting on	Comment				
Vision and Strategic Objectives, Spatial Strategy, Place-Based Strategies and Site Allocations								
Site Allocation 1 Hampton Square, Hampton								
1	Joly Cox, Transport for London	148	Site Allocation 1 Hampton Square, Hampton	<u>[See Appendix 4 in the Schedule of all responses received to the Consultation on Proposed Main Modifications to view these representations in a clearer format].</u>				
				Section	Track change/comment – Reg.18	Updated track change/comment – Reg. 19	Statement of common ground conclusion	Updated TfL response
				Site Allocation 1: Hampton Square Hampton	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.	Although we welcome the reference to car parking provision in line with London Plan standards, the use of the word ‘retain’ could be misinterpreted as requiring the existing level of provision. London Plan Policy T6 part B states that ‘Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’).’ Part L states that ‘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.’ Therefore, to be consistent with London Plan Policy T6 the site	On-going in relation to London Plan parking standards in Site Allocation 1. TfL preference is to remove the word ‘retain’ even if the word ‘minimise’ is not adopted instead.	TfL maintains that wording should be changed to use the word ‘minimise’. To ensure the site allocation isn’t misinterpreted as requiring the existing level of provision, the use of the word ‘retain’ should be changed to ‘minimise’.

						allocation should be amended as follows: ‘retain minimise car parking provision in line with current London Plan standards.’			
Site Allocation 4 Car Park for Sainsburys, Uxbridge Road, Hampton									
2	Hamish Dean (WSP) obo Sainsbury’s Supermarkets Ltd	118	Site Allocation 4 Car Park for Sainsburys, Uxbridge Road, Hampton – <i>in relation to policy requirement for affordable housing</i>	<p><u>Site Allocation 4 Car Park for Sainsbury’s, Hampton, first bullet point:</u></p> <p>In our previous representations to Regulation 18 and 19 consultations, we were supportive of the allocation’s removal from the MOL land designation and the reprovision of the car park and Petrol Filling Station (PFS).</p> <p>However, we requested that the allocation remove reference to 100% affordable housing provision within the first bullet point of the allocation requirements and recommended that the affordable housing levels set out in draft Policy 11 should apply to the site.</p> <p>Unfortunately, the Proposed Modification do not make this adjustment and so the plan does not reflect the Local Plan evidence base, or the Inspector’s findings. We strongly suggest that the Council reconsiders this as the Plan will be unsound for the following reasons.</p> <p>The draft allocation continues to state that “the exceptional circumstances” justifying the MOL release are set out under Policy 11 to meet the identified affordable housing needs of residents and, therefore, any future development scheme coming forward for this site should deliver 100% on-site affordable housing.</p> <p>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 simply not correct. The tenure of the residential units has nothing to do with the exceptional circumstances justifying removal from MOL. The exceptional circumstances which demand the site’s removal from MOL is the fact that it is an existing foodstore car park and Petrol Filling Station (PFS). Clearly the site does not fulfil any of the strategic objectives of MOL set out in London Plan at paragraph 8.3.1:</p> <ul style="list-style-type: none">• to protect and enhance open spaces;• improve quality of life; and• contribute to the City’s green infrastructure, providing spaces for recreation, heritage, biodiversity, and health benefits. <p>Furthermore, the Council’s evidence base provides the justification for the removal of the site from MOL. The ‘Metropolitan Open Land Review Annex Report’, dated 26th August 2021, prepared by Arup, identifies the Sainsbury’s car park site as forming part of MOL ‘Parcel 1’ which is known as ‘Longford E and Schools’. Against the London Plan MOL criteria the northern tip of Parcel 1, where the Sainsbury’s car park is located, scores weakly.</p> <p>For criterion 1: ‘contributes to the physical structure of London by being clearly distinguishable from the built-up area’ this part of the parcel is noted as being “completely eroded and therefore scores weak (1)”.</p> <p>For criterion 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’ this part of the parcel is noted as being the “developed northern tip and inaccessible Longford River corridor offers no open-air facilities”.</p> <p>For criterion 3: ‘contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value’ there is no public access or public right of way, but the Longford River is designated as a SINC and so the parcel scores weak moderate (2) for this criterion. Sainsbury’s car park and PFS clearly have no features or landscapes of national or metropolitan value.</p> <p>For criterion 4: ‘forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria’ the site is noted for “hard standing in the northern tip is likely to provide no wildlife value”.</p> <p>Overall, the Parcel 1 is considered to meet its MOL purposes, but the Report states that: “The developed northern tip and the northern part of the Longford River performs weakly against all MOL criteria” and “it is recommended the MOL status of the developed northern part of the parcel, and the northern part of the Longford River without adjacent green space is considered further”.</p> <p>The evidence base is the justification and demonstration of an exceptional circumstance to allow the site’s removal from the MOL. The site’s designation as MOL is a historical oversight and needs to be rectified regardless of the future development of the site.</p> <p>Clearly, the Council has considered the Sainsbury’s car park and PFS further and decided to remove it from MOL because it is developed and serves no MOL function. It has nothing to do with whether the site can meet the need for affordable housing, and it is disingenuous to state that it does.</p> <p>In addition, the requirement for 100% affordable is not sufficiently justified, nor is it likely to be viable, and it is contrary to the draft Policy 11 on affordable housing, which does not require 100% affordable housing. As such the reasoning for the site being removed from MOL designation should be reworded, emphasising that the MOL removal is due to the site’s existing use as foodstore carpark and petrol filling station.</p> <p>The allocation wording should reflect Policy 11: Affordable Housing, as it is proposed to be amended by Main Modification 49.</p>					

				Summary In summary, if SSL cannot satisfactorily and feasibly trade their stores, the sites will simply not be brought forward for development. SSL strongly encourage the Council to review the wording of the first bullet point of proposed Allocation 4, rewording the reasoning for the site being removed from MOL designation and removing reference to 100% affordable housing requirement. The current wording makes the draft Plan unsound.										
Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake														
3	Joly Cox, Transport for London	148	Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake	<p>[See Appendix 4 in the Schedule of all responses received to the Consultation on Proposed Main Modifications to view these representations in a clearer format].</p> <table><tr><th>Section</th><th>Track change/comment – Reg.18</th><th>Updated track change/comment – Reg. 19</th><th>Statement of common ground conclusion</th><th>Updated TfL response</th></tr><tr><td>Site Allocation 35: Stag Brewery, Lower Richmond Road, Mortlake</td><td>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.</td><td>We reiterate our previous comments that the proposed bus standing within the Stag Brewery site should be regarded as additional to, and independent of, the bus stops and standing facility at Avondale Road. To ensure consistency with London Plan Policy T3 the wording should be amended to remove reference to the Avondale Road bus station by replacing the current wording: ‘The opportunity to relocate the bus stopping/turning facility from Avondale Road bus station to this site should be investigated, if appropriate, as part of a comprehensive redevelopment’ with ‘Additional bus standing space is likely to be required within the development site.’</td><td>On-going in relation to the Avondale Road bus station. TfL maintains its position that the more flexible wording regarding bus standing should be adopted because the Avondale Road bus station is a separate issue.</td><td>We reiterate our previous comments that the proposed bus standing within the Stag Brewery site should be regarded as additional to, and independent of, the bus stops and standing facility at Avondale Road. 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Areas of the development which were proposed for bus standing/turnaround facility safeguarding were disregarded by Richmond council and</td></tr></table>	Section	Track change/comment – Reg.18	Updated track change/comment – Reg. 19	Statement of common ground conclusion	Updated TfL response	Site Allocation 35: Stag Brewery, Lower Richmond Road, Mortlake	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. 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								that land now forms part of a community park in the latest planning application.	
Theme: Responding to the climate emergency and taking action									
Policy 3 Tackling the Climate Emergency (Strategic Policy)									
4	Max Balfour	n/a	Policy 3 Tackling the Climate Emergency (Strategic Policy)	<p>Subject: Policy 3</p> <p>Policy 3 starts with the statement “Climate change is now the greatest challenge facing our society”.</p> <p>This is factually wrong and should therefore be deleted.</p> <p>The word “society” is not defined but presumably refers to our local Richmond and Twickenham community since this is a “Local Plan”. Clearly climate change is not a significant challenge to residents of Richmond and Twickenham.</p> <p>I would suggest that the more obvious challenges are cost of living, social care, ever increasing tax burden, over regulation and lack of affordable housing.</p> <p>I am happy to be corrected if you can point to material impacts of climate change current or future that will impact residents of Richmond and Twickenham.</p> <p>Given policy 3 is based on a false premise I suggest that it needs to be completely rewritten and significantly watered down with the ridiculously onerous goals being removed.</p> <p>Please note that this is in your own interest because retaining a false statement as the premise for the policy will open you up to legal challenges in the future.</p>					
Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)									
5	Nick Alston (Avison Young) on behalf of St George Plc	126	Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy) – in relation to carbon offset rate of £300/t	<p><u>Policy 4 – Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency</u></p> <p>We note that a modification to revise the carbon offset cost of £300/t) has not been proposed. As per our Hearing Statement to Main Matter 13 we consider this necessary for the plan to be sound as the £300 figure is not adequately justified.</p>					
Theme: Delivering new homes and an affordable borough for all									
Policy 15 Infill and Backland Development									
6	Tim Catchpole, Mortlake with East Sheen Society	85	Policy 15 Infill and Backland Development, Policy 28 Local Character and Design Quality (Strategic Policy)	<p>(2) Outbuildings in back gardens</p> <p>We feel the issue of outbuildings needs further attention. The Proposed Modifications hardly address this in Policy 15, albeit they make some reference to it in Policy 39. We cannot recall this issue being discussed at the Public Examination (admittedly I was overseas for some of the time) and, since the Examination, the issue has evidently become more significant. We have drawn attention to this in a letter to the Council dated 9 December 2024 and we are doing so again in relation to the new Local Plan.</p> <p>In our letter to the Council, we drew attention to two problems:</p> <p>(a) planning applications for a certificate of lawful development for outbuildings were being assessed in terms of whether the buildings complied with the dimensions given in the GPDO but not in terms of their impact on a Conservation Area, protected landscape, site of nature conservation importance (which we note has been given more prominence in the Proposed Modifications) and/or flood-risk. Admittedly such issues can be addressed through imposition of an Article 4 direction if in a Conservation Area, but not otherwise.</p> <p>(b) Planning applications for outbuildings in the form of mobile homes, self-contained with living room, bedroom, kitchen and bathroom and with access to the services of the main house, are being allowed because mobile homes come under the control of the Caravan Sites Act, not the Planning Act. These would be acceptable – and could maybe help the Council to achieve its housing supply targets – if the mobile homes were genuinely mobile. But they are not, they do not have wheels, they arrive on site as construction kits and they could become permanent fixtures. The Council cannot refuse such development in the knowledge that such development has been and will continue to be allowed on appeal. This needs to be rectified through a change in legislation.</p> <p>We would like to see the issue of outbuildings addressed more fully in the Local Plan and/or in a Supplementary Planning Document.</p>					
Theme: Increasing jobs and helping business to grow and bounceback following the pandemic									
Policy 21 Protecting the Local Economy (Strategic Policy)									
7	George Offer, The Offer Group Ltd.	143	Policy 21 Protecting the Local Economy (Strategic Policy) Policy 23 Offices	<p>We wish to re-submit the representation submission from 21st July 2023 and Draft Richmond Local Plan (Regulation 19) Consultation Response (please see attached) [See Rep Nos. 404 and 409 in Appendix 4I to the Statement of Consultation: Schedule of responses received to the Publication Draft Local Plan (Regulation 19) (SD-011), or in full on the Council's website]. This representation remains valid and we encourage the inspector to review this in the context of the currently drafting of policies 21 and 23 before closing the examination of the Richard Local Plan.</p> <p>As an extension to this representation, we further implore the Inspector to consider the new NPPF was published in December 2024 (with a minor update to footnotes in February 2025). which is wholly relevant to the current drafting of policies 21 and 23 and further accentuates the need to reconsider these policies.</p>					

				<p>Paragraph 125 c) of the new NPPF includes new wording that provides a much stronger presumption in favour of approving development on brownfield land where “..<i>substantial weight should be afforded to using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused</i>”.</p> <p>This is directly relevant to policies 21 and 23 of the RLP and highlights the inconsistency with the approach taken by the RLP.</p> <p>The new NPPF sets out an increase in the housing need for Richmond, based on the standardised methodology for calculating housing need. This sets out an increase in need from 2,283 homes per year to 2,513 new homes per year. The 2023 Housing Delivery Test results, published in December 2024, further highlight that in the proceeding 3 years of monitoring, Richmond have only delivered 60% of the identified need. This identifies a presumption in favour of development and a clear need for new homes, as NPPF para. 125(c) requires.</p> <p>Furthermore, the Council's response to the Inspector's Main Matter 15, question 15.5, on page 18 of the "Main Matter 15 " document, is neither robust nor justified and further highlights the inconsistency with National and London policy. The Council recognises there is an existing surplus in vacancy but justify their approach on the basis that if this vacant space were to be lost and/or the market were to up-turn, there would quickly be a lack in short-term supply. This shows a clear lack of proactiveness in responding to real life market conditions, particularly on sites outside of a town centre location. In the event of a up-turn in demand, the policies of the RLP should allow development to come forward to provide new office space that is fit for purpose, as opposed to stagnating the market through the creation of policies that needlessly restrict the repurposing and redevelopment office space that is no longer attractive to this current office market.</p> <p>There has been a structural change in office demand post COVID-19 Pandemic with typical 50% reduction in floor space needed which is shown in the council evidence and has exacerbated since then. This is demonstrated by Unilever’s new office in Kingston on Eden Street. Whilst not within LB Richmond, Unilever now plans to only occupy half of the space and the rest is to let. We understand from local agents Cattaneo Commercial. Riverside and Burgoine Quay further highlight this to be the case and the representations submitted before you in respect to these draft policies further highlights many more cases of this.</p> <p>The protection of office space in a town centre is justified to some extent, with some flexibility factored in to ensure the use and activity within the town centre location remains vibrant. However, the protection of office uses within residential areas is not considered sound, where there is no identified need for office space, as evidenced by the Council's own admission of a surplus in supply.</p> <p>The quantum of ‘unofficial office space’ has increased with the Richmond Borough having the highest proportion of people working from home in London. See below article from the Evening Standard. The working age population of the borough is 102,000 as published in the local plan and if 58% of people have a 10sqm home office this is 591,600sqm of office space that the council are not considering in there number and evidence.</p>
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				<div><div><div>THE STANDARD</div><div></div></div><div>Using figures from the 2021 census, the analysis showed that Richmond upon Thames has the highest proportion of people working from home at 58.75 per cent.</div><div><table><thead><tr><th>Borough</th><th>Percentage</th></tr></thead><tbody><tr><td>Richmond upon Thames</td><td>58.75%</td></tr><tr><td>Kensington and Chelsea</td><td>57.62%</td></tr><tr><td>Camden</td><td>56.69%</td></tr><tr><td>Wandsworth</td><td>56.52%</td></tr><tr><td>Islington</td><td>56.13%</td></tr><tr><td>Hillingdon</td><td>31.65%</td></tr><tr><td>Brent</td><td>30.43%</td></tr><tr><td>Enfield</td><td>31.26%</td></tr><tr><td>Newham</td><td>29.21%</td></tr><tr><td>Barking and Dagenham</td><td>20.69%</td></tr></tbody></table></div><div>REBOOT ONLINE</div><div>Ten years ago, in 2011, just 8.94 per cent of people were working from home in the borough.</div><div>Kensington and Chelsea came in second with 57.62 per cent, which is a 47 percentage point increase in the last decade.</div><div>To ensure the RLP meets the NPPF tests of soundness (as required by paragraphs 36 and 37 of the NPPF), it is clear that more needs to be done to create a level of flexibility to alleviate the pressures on empty commercial property that offer a very realistic opportunity to create further residential homes in highly sustainable and residential locations.</div><div>At present, the current wording of policies 21 and 23 is not positively prepared, justified, robust nor consistent with national policy and requires further interrogation before the RLP examination is closed. To not do so will create an outdated policy on the adoption of this Local Plan which will stifle economic growth needlessly for the duration of the Plan period.</div><div>We would be grateful if you could confirm safe receipt of this representation and consideration of the points raised within this email and the attached.</div></div>	Borough	Percentage	Richmond upon Thames	58.75%	Kensington and Chelsea	57.62%	Camden	56.69%	Wandsworth	56.52%	Islington	56.13%	Hillingdon	31.65%	Brent	30.43%	Enfield	31.26%	Newham	29.21%	Barking and Dagenham	20.69%
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8	George Offer, The Offer Group Ltd.	143	Policy 23 Offices	[See Comment No. 7].																						
Theme: Protecting what is special and improving our areas (heritage and culture)																										
Policy 28 Local Character and Design Quality (Strategic Policy)																										
9	Tim Catchpole, Mortlake with East Sheen Society	85	Policy 28 Local Character and Design Quality (Strategic Policy)	[See Comment No. 6].																						
Policy 32 Royal Botanic Gardens, Kew World Heritage Site																										
10	Kim Miller, Historic England	52	Policy 32 Royal Botanic Gardens, Kew World Heritage Site	However, in relation to Policy 32 Kew Gardens, to which no modifications are proposed, we continue to stress the importance of requiring that development proposals that would have an impact on the World Heritage Site are subject to an impact assessment using the Unesco Guidance and Toolkit . On relevant cases, this assessment should be submitted in support of an application. At present, paragraph 20.52 of the supporting text of the Plan alludes to this guidance, but lacks clarity and represents a commitment by the Council, rather than a responsibility to be discharged by applicants.																						
Other comments																										
11	Julia Stafford	n/a	Appendix 4: Review of Sites of Importance for Nature Conservation [MM89]	Please see below and if you have a moment, please can you add Oldfield Meadows also know as Hydes field, as a suspected mistake to the local plan. I will keep trying to correct the mistake in relation to my land and David Taylor’s, because he treated me like a human being and I realised that I was not alone. I can only do so up to a point because I do not have 7 years and 2 judicial reviews for it to be family home. Sincerely and thank you for your time.																						

				<p>I enclosed the supplementary question I tried to ask, below. I believe it is directly relevant to the question I raised, including the recent decision to turn Oldfield Meadows into a nature reserve. https://secretldn.com/oldfield-road-meadow-hampton/.</p> <p>In the local plan, this area is called Hydes field and it has MOL designation. Please see attached.</p> <p>I am concerned that public consultation and/or advertising the change of use in public media is related to the case of R (ooo Peter Day) v Shropshire Council and others [2020] EWCA Civ 1751 and that this is incorrectly being used as a road map to strip these legal protections, through a change of use.</p> <p>I believe this is dishonest and that information that is being shown to Cllrs is being manipulated.</p> <p>I believe that the council is being exposed to internal and external abuse because you do not have in-house legal advisors and/or the SLLP is operating as an unregulated law firm.</p> <p>I have been trying to protect the Council, Councillors and constituents against allegations of fraud.</p> <p>I believe that my family and I have been targeted, in part, for trying to raise these issues and that had legal advice been available or sought be officers and these legal mistakes corrected, we would not have been placed in danger and/or helped and believe when matters escalated to the point that I was physically assaulted and my children and husband threatened.</p> <p>Quote</p> <p>As a former, if not current qualitative researcher, councillor and leader of the council you must understand how divisive legal misinformation can be and legal mistakes that are not corrected even weaponised.</p> <p>You saw what was done to my family, including my <i>[personal details removed for data protection]</i>.</p> <p>How many more constituents like me are there who keep trying to correct mistakes and raise concerns because legal advice is not available to officers or even sought in the first place?</p> <p>Can environmental protections be removed, the constitution changed, leases terminated early and planing inspectors findings ignored without any legal basis and councillors incorrectly assume independent legal advice had been relied upon?</p> <p>Unquote</p>
12	Diana Hutchings	n/a	n/a	<p>There is no point in giving the lease to the dose of nature for the nature reserve Pensford field. They do not turn up for the ‘workdays’ and have never been seen taking an interest in working in the field. The idea is that we are not against mental welfare, but the council have built a lovely spaces in the ‘Rec’ as it is locally named. This would keep the nature reserve free for the hard working committee of :Pensford field, give the locals a bit more respect for the council, and keep a very valued nature reserve for the wildlife. Apart from two sections of bee keepers, there are two badger sets, 13 sp. Of butterfly, special bats.etc... Darrell school was visiting the field and there was the grey heron. This was delightful because they had just had a story about the grey heron. The forest school have special clothes to wear in the field so they can enjoy the wilderness.</p> <p>The building in North Sheen Recreation ground has so many Facilities like an outside gym, football ground, with changing rooms. There are several rooms perfect for the Dose of Nature to occupy and then their clients can have a game of footy with the local lads. and lasses.!</p> <p>I hope this is important to the inspector because it is important to the residents of Kew.</p>