

# Local Plan Review scoping consultation responses

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Planning

*23 February 2016*

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All responses received to the Local Plan Review scoping consultation  
[www.richmond.gov.uk/local\\_plan\\_review](http://www.richmond.gov.uk/local_plan_review)



Consultation from 4 January until 1 February 2016

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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.

Respondent reference no.	Name / Organisation
1.	Caroline Britton
2.	S.J Green
3.	Raakhee Patel, Sport England
4.	Alice Jean Cousens
5.	Lucy Owen, Port of London Authority
6.	Caroline Brock, Kew Society
7.	Georg Hoefler
8.	Ian Walton
9.	Shahina Inayathusein, London Underground Infrastructure Protection
10.	Philip Robin
11.	Juliet Nolan
12.	Ross Anthony, Theatres Trust
13.	Neil Wilton
14.	Peter Britton
15.	Fiona McDaniel
16.	Bryony Lodge
17.	Karen Skipper
18.	Murray Smith, Dunphys Chartered Surveyors obo St. Clair Business Centre
19.	James Lloyd, James Lloyd Associates obo Tyton Properties Limited
20.	Ham & Petersham Association
21.	Andrew Payne, Greater London Authority, Mayor of London
22.	Kevin Scott, Kevin Scott Consultancy obo Port Hampton Estates Limited (Platts Eyott)

Respondent reference no.	Name / Organisation
23.	Jonathan Stobbart, CBRE obo The Laboratory of the Government Chemist
24.	Jan Gare, Ham Library Friends Group
25.	Andy Sutch, Sport Richmond
26.	Bryce Tudball, Royal Borough of Kingston
27.	Andrew Barnard
28.	Margaret Simpson
29.	Richard Geary
30.	Kevin Rice
31.	Laura Morgan
32.	Jane Harrisson
33.	Jane Morrisson
34.	Mary Stephens
35.	Paul Lapham
36.	Andree Frieze
37.	James Sinclair, Teddington Society
38.	Krystyna Kujawska, SCAMPS
39.	Max Millington
40.	Diana Collins
41.	Rebecca Bilfinger, GVA obo Lady Eleanor Holles School
42.	Andrew Dorrian, Transport for London Planning
43.	Alice Shackleton
44.	Rebecca Pullinger, Campaign to Protect Rural England (CPRE)
45.	Ron McEwen
46.	Kathleen Massey
47.	Paul Massey

Respondent reference no.	Name / Organisation
48.	Lizabeth Rohovit
49.	Neill Tughan
50.	RPS Planning and development on behalf of S. Oxley
51.	Tim Catchpole, Mortlake with East Sheen Society
52.	Dale Nolan
53.	Tor Barrett, Nathaniel Lichfield & Partners obo West London Mental Health NHS Trust
54.	Cllr Martin Elengorn obo Liberal Dem Group of Councillors
55.	Peter Dowling, Indigo Planning Limited obo Sainsbury's Supermarkets Ltd
56.	Cllr Liz Jaeger
57.	Katherine Jones, Savills obo Thames Water
58.	Katie Brown, Nathaniel Lichfield & Partners obo St Mary's University
59.	Caroline Wilberforce, Indigo Planning Limited obo Ashill Land Limited
60.	Tanja El Sanadidy, Indigo Planning obo Shepherd Enterprises Limited
61.	Louise Spalding, Defence Infrastructure Organisation
62.	Marie-Claire Marsh, Nathaniel Lichfield & Partners obo Rugby Football Union
63.	Daniel Osbourne, Barton Wilmore obo Quantum Group
64.	Tor Baret, Nathaniel Lichfield & Partners obo The Harroddian School

Respondent reference no.	Name / Organisation
65.	James Sheppard, CBRE obo CBRE Global Investors ('CBREGI')
66.	Joanna Debs, Harlequin Football Club Ltd
67.	Alex Arrol, Goldcrest Land
68.	Robert Mackenzie, RPS obo Richmond-Upon-Thames College
69.	Steve Simms, SSA obo Kentucky Fried Chicken (Great Britain) Limited
70.	Andree Gregory, Highways England
71.	Pauline Holmes, Natural England (Thames Valley Team)
72.	Samantha Davenport , Natural England (Dorset Hampshire Isle of Wight)
73.	Lucy Gate, Public Health, London Borough of Richmond upon Thames
74.	Greg Pitt, Barton Wilmore obo UK Pacific Hampton Station LLP
75.	NHS England , NHS Property Services, Healthy Urban Development Unit (HUDU) and Richmond CCG
76.	James Togher, Environment Agency
77.	Ann Holdsworth, Amec Foster Wheeler obo National Grid
78.	Katharine Fletcher, Historic England
79.	David Shaw, The Alberts Community Association
80.	Laura Stritch, Transport for London Property

**Table 1:** All respondents to the consultation

Detailed comments as received:

Ref. no.	Name / Organisation	Detailed comment		
1.	Caroline Britton	<p>I have looked at the consultation document which I received by email today and am very concerned that the St Michael's Convent site has been listed as an area for development - specifically including affordable housing. Given the price of land near Ham Common, it seems that the only way the site could provide an opportunity for affordable housing is if it were high density. This would be completely at odds with the character of the area, which is a precious oasis of green, quiet and tranquillity.</p> <p>The implications for traffic are also serious. I live in Martingales Close which is a cul de sac, bounded down the whole of one side by the brick Convent wall. The Close is a narrow and twisting road, accommodating 27 family houses. The fact that there is no access into the Close from the Convent site keeps traffic to a manageable level and means it is a relatively safe place for children to play. If that were to change, it would drastically alter the environment for all the local residents.</p> <p>I understand the pressures on the Council and accept there has to be some change, but would urge that this has to be in keeping with the nature of the existing area.</p>		
2.	S.J Green	<p>Under the Green Belt Statement that appears in Appendix 1 it should be made clear that, as stipulated by the Examiner and later set out in the Development, Management Plan, the land at Fulwell Golf Club, Twickenham Golf Club, Squires Garden Centre, the allotments at Sixth Cross Road and Natalie Mews is held under the Green Belt (London and Home Counties Act) and, as such requires Ministerial Consent, which is separate from planning permission for all development on that land.</p> <table border="1" data-bbox="555 699 2078 762"> <tr> <td data-bbox="555 699 882 762">Green Belt Statement</td> <td data-bbox="891 699 2078 762">Statement to say that the Council relies on CP10, London Plan and national policy guidance with regard to Green Belt</td> </tr> </table>	Green Belt Statement	Statement to say that the Council relies on CP10, London Plan and national policy guidance with regard to Green Belt
Green Belt Statement	Statement to say that the Council relies on CP10, London Plan and national policy guidance with regard to Green Belt			
3.	Raakhee Patel Sport England	<p>Thank you for consulting Sport England on the above document. Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our national and regional priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields and a non statutory consultee on planning applications proposing major housing development. Sport England would wish to make the following comments on the above consultation document:</p> <p><b>Section 4.3: Design and Character</b> Support (with amendments) Sport England recommends that Sport England's Active Design Guidance <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</a> is referenced within this section.</p> <p>Sport England believes that being active should be an intrinsic part of everyone's life pattern. The master planning of major new housing and mixed use development schemes has a vital role in providing easy access to a choice of opportunities for sport and physical activity, making new communities more active and healthy. Active Design is aimed at urban designers, master planners and the architects of our new communities. Active Design is an innovative set of design guidelines to promote opportunities for sport and physical activity in the design and layout of development. The guidance promotes sport and activity through three key Active Design principles of – improving accessibility, enhancing amenity and increasing awareness. The criteria set out within the Active Design Guidance can be used both as a guide during the planning process, or as a critic for developments that have already been designed.</p> <p><b>4.5: Natural Environments, Parks, Open Spaces, Rivers and Sport &amp; Recreation</b> Support (with amendments) Sport England would recommend that this policy is revised in line with the below policy objective (related policy approaches can be found at the following link: <a href="http://www.sportengland.org/media/121906/document-7-spatial-planning-for-sport-development-control-">http://www.sportengland.org/media/121906/document-7-spatial-planning-for-sport-development-control-</a></p>		

Ref. no.	Name / Organisation	Detailed comment
		<p><a href="#">guidance-note-.pdf</a>            Planning Policy Objective 13 aims to support and promote the use of natural resources for sport in a way which meets sustainable development objectives. Sport England considers that development proposals for sport should be based on the 'Best Available Place' principle. This involves a planned approach to the provision and protection of sites and facilities, including the assessment of the impact of any sports use and a commitment to appropriate management measures.</p> <p><u>Local Plan Evidence Base</u>            The National Planning Policy Framework (NPPF) requires each local planning authority to produce a Local Plan for its area. Local Plans should address the spatial implications of economic, social and environmental change. Local Plans should be based on an adequate, up-to-date and relevant evidence base. In addition, paragraph 73 of the NPPF requires that:  <i>"Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area."</i></p> <p>Although it is acknowledged that the Council completed a borough-wide Open Space, Sport and Recreation Needs and Opportunities Assessment in 2015, Sport England is aware that a revised Playing Pitch Strategy is in the process of being finalized. As such, Sport England would strongly recommend that this revised strategy is formally adopted prior to a review of policy, otherwise there is a risk that the policies contained in the Core Strategy may be found to be unsound as they are not fully justified.</p> <p><b>4.8: Social infrastructure, education, health and wellbeing</b></p> <p><u>Support</u>            Sport England welcomes the priority to tackle health inequalities. Sport England would recommend inclusion of a broad range of sporting and fitness facilities and activities. Sport England would recommend that this policy is revised in line with the below policy objective: Planning Policy Objective 8 aims to promote the use of planning obligations as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development.</p> <p><u>Regulation 123 List</u>            The revised Playing Pitch Strategy that is being produced for the borough will help the Council determine what sports infrastructure is required for playing fields and also inform the sporting needs arising from strategic development sites. Sport England would recommend the Council ensure that the outputs from this work can be fed into the Council's Regulation 123 List.            We hope these comments can be given full consideration. Please do not hesitate to contact the undersigned if you have any queries or would like to discuss the response.</p>
4.	Alice Jean Cousens	<p>Comment for Draft Sustainability Appraisal Scoping Report:            In relation to the Environment section:</p> <ul style="list-style-type: none"> <li>• The <u>summary</u> does not include reference to biodiversity - only to 'Protection and enhancement of the natural environment and green infrastructure including green and open spaces' . I would like the word 'biodiversity' added after the words 'natural environment'</li> <li>• In the detailed item no 1 'Conservation and enhancement of biodiversity'. the Description only refers to 'designated areas' such as of national, regional or local significance. This may appear to limit the protection of biodiversity to only that which is located in areas which have been designated. I would wish the value of the biodiversity currently using or present on any site to be considered whether or not that site had been designated as of significance (eg for example if a local person commenting on the application provided evidence of a significant species on that site.</li> <li>• I would like the reference to 'fragmentation of the green spaces' to be strengthened to be more active such as to 'maintain and protect existing green corridors and routes for wildlife movement' (or similar wording). [ I am not sure how LBRuT defines green</li> </ul>

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		<p>corridors but I would wish to include even narrow wildlife routes eg hedgerows. All such green routes will be important to prevent creatures such as hedgehogs losing safe routes for foraging and to prevent pools of creatures being isolated - this will be even more important with climate change.]</p> <p>Comments on the Local Plan review. Most of these relate to concern that there should be no undermining or weakening of ecological policies in LBRuT.</p> <ol style="list-style-type: none"> <li>1. CP1 - the rationale for weakening the definition of 'sustainable' is to avoid 'confusion' with 'the overarching definition' but it is the latter which has caused the confusion and watered down the ecological meaning of the word 'sustainable' . Most residents, if they understand the word 'sustainable' at all will believe that the term means that the development is not intended to have a harmful ecological impact or even will have a beneficial ecological impact. Unless specifically compelled to do so by national or London policy, I do not support any change to the LBRuT definition of word 'sustainable' as originally intended by LRBRuT policy to maintain a close connection to the ecological meaning of the word.</li> <li>2. Further argument for the above comment is that most residents in LBRuT would rate the green and open spaces of the Borough as being one of its most important features for living here and the Local Plan is a reflection of <i>local residents'</i> concerns and therefore may legitimately place a higher standard of ecological protection on those green and open spaces than is set in national and London policy</li> <li>3. CP2 - I do not support any reduction of the current 20% renewable energy policy. Any contrary political views are ideologically out of kilter with UK commitment to the Paris agreement - given 99% scientific opinion concurs that there is a human cause of climate change, no local government policy should be weakened in relation to climate change policy and renewable energy. Again the London Plan is no argument for lowering LBRuT standards, unless local authorities are specifically <i>compelled</i> to lower our standards by the Mayor of London</li> <li>4. 'decentralised energy' - most residents will not recognise this term and as its definition is not clear it will allow undermining of the concept of renewable energy which is relatively genuine term which most of us do understand</li> <li>5. DMSO1 - I do not support the reduction from 40% to 35% for the reasons set out in 3 above</li> <li>6. DMSD4 - I would not support any 'consolidation' of climate change policies for the simple reason that this risks undermining or watering them down - if it isn't broken, don't fix it. Alternatively if the current administration of LBRuT is ideologically in support of non-renewable energy and in support of policies based on climate-change-denial, maybe they should honestly say that this is the reason for this proposed change, rather than weasel words about 'consolidation'</li> <li>7. CP4 - I do support the reference to 'gains in biodiversity'</li> <li>8. CP4 - what is the definition of 'green infrastructure'? Does it include wild fauna? does it specifically embrace the concept of biodiversity? A keynote definition should be provided so that it does not cause confusion.</li> <li>9. CP4 - I am concerned that the reference is to protecting those of 'strategic importance' means that biodiversity in other places will not be protected- is a hedgehog route along a hedge of strategic importance? If not, we fail to take into account the cumulative significance of each time we destroy a green route, however small - the cumulative impact on a species such as the hedgehog of each time such small green routes are destroyed cannot be denied .</li> </ol> <p>DMDC5 - the reference to 20m for backland development should not be weakened in any way but rather strengthened - 20 m should be treated as the very minimum and evergreen screening should be required. I have personal experience of backland development at a distance of exactly 20m. I can clearly see into the bedrooms and lounges of the new flats at this distance; consequently the new residents opposite have to keep blinds down all the time (just as I have to keep my toilet and kitchen blind down all the time now) - this is not good planning policy but leads to squalid existence. Comparison cannot be made with overlooking from a road because no-one expects backland development and the existing houses will have been designed with</p>

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		<p>the understanding that there will not be overlooking from 'behind' . Your argument is that the term 'unneighbourly' can be misunderstood - so can any term eg 'good' 'peace' 'high quality' but I hope we wouldn't therefore omit all these positive words from our policy aspirations. While 'unneighbourly' is not an objective term, it still sets a principle and an aspiration and gives residents a sense of what could be argued for in new developments - most of us have more sense of what 'unneighbourly' means - more so, for example, than what the overarching planning policy use of the word 'sustainable' means.</p>
5.	Lucy Owen Port of London Authority	<p>Thank you for consulting the PLA on the scope and rationale for review of planning policies, together with the emerging site allocations.</p> <p><b>Sustainable development, climate change, pollution and waste</b></p> <p>It is noted that the existing core policy on sustainable development is proposed to be amended so that it focuses on sustainable construction. Given the riparian nature of the Borough this should include maximising the use of the river during construction where practicable in line with policy 5.18B of the London Plan.</p> <p><b>Natural environment, parks, open spaces, rivers and sport &amp; recreation</b></p> <p>The PLA welcomes in principle the consolidating and streamlining of policies relating to the River Thames whilst retaining existing policy approaches. Care needs to be taken with any policy increasing/improving access (is this to the riverside or to the river itself) and protecting and enhancing the rivers' biodiversity whilst maintaining navigational safety. There are also health and safety implications of accessing the river. It is noted that the Council will be seeking to manage expectations in terms of residential moorings, will there also be policy approaches relating to leisure and visitor moorings?</p> <p><b>Transport</b></p> <p>The PLA would welcome an update of the transport policies to specifically encourage river transport in line with the London Plan's Blue Ribbon Network policies for passengers, tourism and freight transport. The PLA also welcomes the Council's proposed consideration of the identification and protection of wharves for the shipment of freight. It is recommended that any transport policies also seek to maximise the use of the river during construction where practicable in line with policy 5.18B of the London Plan. The PLA is currently unaware of any proposals for foot/cycle bridges across the River Thames and would wish to understand the evidence that the Council has to justify any particular crossing in any particular area.</p>
6.	Caroline Brock Kew Society	<p>Thank you for the opportunity to comment on the scope and rationale for revising the Council's planning policies. We have the following comments.</p> <ol style="list-style-type: none"> <li>1. Do you agree with the Council's assessment of the existing policies against national policies, in particular the National Planning Policy Framework (NPPF)? Yes.</li> <li>2. Do you agree with the Council's assessment of the existing policies against regional policies, in particular the London Plan? Yes.</li> <li>3. Are you aware of any other pieces of research or evidence that the Council should be using when considering the local needs as well as the rationale and scope for the review of the policies? Perhaps the House of Lords Select Committee which is currently examining National Policy for the Built Environment. Also the Select Committee on the Environment reports on air pollution, carbon emissions and noise and legal judgements on the UK's failure to comply with EU clean air requirements.</li> <li>4. Do you agree with the Council's rationale for the review of existing policies and do you have any specific comments in relation to the proposed scope of the review? The Kew Society welcomes the proposal to bring the Core Strategy and Development Management Plan into a single Local Plan and the alignment of site allocations with the needs of the Borough. It would also be a great help if relevant SPDs could be cross-referenced in the Local Plan. (Paras 1.2.3 and 13.1 of the consultation document). We also welcome the proposal to establish a Scrutiny Panel on basement policy which continues to be a concern because of the size, effects on water courses and flooding and safety as witnessed in the recent house collapse in Barnes. (Para 4.3.7).We</li> </ol>

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		<p>welcome the emphasis on green infrastructures (paras 4.5.1 and 2). Alignment with the Greater London National Park City should also be considered. We welcome the commitment to giving communities access to financial viability data (para 4.7.6) which should be made available at the same time as the planning application is submitted. The commitment to this and to review of assessments as schemes progress needs to ensure that greater weight is given to community interests rather than commercial profit, not least to make polices on affordable housing deliverable in practice. We agree with the aims of the policies on key office and employment areas (chapters 6 and 7) and wonder if this approach should also be applied to small local community facilities such as artist studios, sports venues etc. We wonder whether the review should also include something on reducing the length of time permitted between the granting of planning permission and the start of work on, particularly, commercial re-developments so that sites are not allowed to become derelict. We are not clear at present on how social housing will be addressed to ensure social sustainability</p> <p>5. Do you agree with the Council's indicative identification of sites, including the proposed land uses, to be considered for allocation in the Local Plan? Yes (in relation to Kew as our focus of interest).</p> <p>6. Are you aware of any other key sites within the borough that should be considered for allocation because they are either:</p> <ul style="list-style-type: none"> <li>• more than 0.25 hectares in size;</li> <li>• would provide ten or more homes;</li> <li>• would meet a development need identified in the Council's Local Plan and strategic policies?</li> </ul> <p>No.</p> <p>7. Do you agree with the Council's approach to a borough-wide Strategic Housing Market Assessment? Broadly yes but see our comments above on social housing. Rising prices for purchase or private rental are a concern, including the difficulties that arise for housing of key workers.</p>
7.	Georg Hoefler	<p>We are residents at Martingales Close, Ham and we fully support the objectives of Martingales Close Residents Association i.e. to resist the provision of major development, additional parking areas or new access points as this would significantly change the character of Martingales Close; and to maintain and enhance the biodiversity and historical planting of the unique gardens and grounds, possibly with provision of managed public access for several days every year and designation of the grounds as Local Green Space. We further support designating the gardens Other Open Land of Townscape Importance as proposed in your site allocation consultation.</p>
8.	Ian Walton	<p>With reference to your Local Plan consultation document dated 31 December 2016, recently received, and our subsequent telephone conversation, I wish to confirm that all the 213 acres of land including, Fulwell Golf Course, Squires Garden Centre, Natalie Mews Housing, the allotments, Twickenham Golf Course and the Amida Sports Centre, should be shown in the Plan denoting the status of the land as 1938 Green Belt controlled by the 1942 Deed of Covenant. Further details of this land occur in the Examiner's, Mr Gideon Amos's, Report of 12 September 2011, which was adopted by the Council on 1 November 2011. Should you need any further information do please contact me.</p>
9.	Shahina Inayathusein London Underground Infrastructure Protection	<p>We have no comments to make at this stage except that London Underground Infrastructure Protection need to be consulted as Statutory Consultees on any planning application within 50 metres of the railway. 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>
10.	Philip Robin	<p>The Council needs to consider how it communicates with local residents to make them aware of future consultation on the Local Plan documents. I found out about this consultation through my professional work. An email to residents?</p>

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		<p>2. 4.6 Transport – consideration should be given to traffic calming, through public realm enhancement, 20mph speed limits etc. For example, the redevelopment of Mortlake Brewery provides the opportunity to “reclaim” some of Mortlake High Street for people travelling by foot or cycle. Junction capacity limitations means that no justification for this to be a dual carriage way.</p> <p>3. DM TP8 – fully agree that the Borough needs to ensure adequate parking to minimise impact on street congestion and amenity. The GLA policy to limit parking as a means of reducing use of the car and encourage walking and cycling is completely unjustified by evidence. Studies around Nine Elms have proved that traffic generation of residential development is not directly related to car parking provision – a more sophisticated approach is needed that recognises that many people only use their cars occasionally, and use public transport on a daily basis. And increased priority for pedestrians and cyclists means making improved provision, not just warm words of good intention. Remodelling Mortlake High Street (see above) is an example.</p> <p>4. DM HO2 and HO3 – residential land values encourage the redevelopment of every scrap of land. For example the redevelopment of lock up garages. It is not clear whether this is infill or back land development, but there needs to be a policy to recognise that such facilities should be protected. They provide car parking without cluttering streets and many garages are used for storage by local shops and residents.</p> <p>5. CP15 – providing affordable housing should be a top priority in a high value Borough like Richmond. Yet the Council is letting developers get away with limited or no provision, through the use of “viability appraisals” that are not subject to public scrutiny. Viability needs to be scrutinised in a more sophisticated way. By way of illustration, the recent planning permission for the residential development of lock-up garages at 29 Charles Street excused the developer from any contribution towards affordable housing because of alleged viability issues. No doubt part of the high costs was due to the proposed basement excavation of the entire site (how sustainable is this for the environment and the people who end up living there?). The developer exercised his option to purchase the site and sold it on simultaneously to another developer for £3.5m (as noted in land registry documents) making a 120%+ profit in the process. The Council must have policies whereby a proper viability assessment is undertaken, with clawback provisions.</p> <p>6. In preparing a new plan for the Borough, please do not simply regurgitate the NPPF and London Plan. Try to be visionary, keep the plan brief and consider introducing a policy where the larger sites have planning briefs prepared for them in due course when they come forward for development – it would be a far more satisfactory way to engage with the local community and is likely to lead to a better outcome on the ground.</p>
11.	Juliet Nolan	LDF consultation on The Convent Gardens in Ham. I wish to support designating the gardens as Other Open Land of Townscape Importance as proposed in their site allocation consultation.
12.	Ross Anthony Theatres Trust	<p><b>Remit:</b> The Theatres Trust is the national advisory public body for theatres. We champion the past, present and future of live theatre, by protecting the buildings and what goes on inside. We believe that current and future generations should have access to good quality theatre buildings where they can be inspired by, and enjoy, live theatre. We were established through the Theatres Trust Act 1976 ‘to promote the better protection of theatres’ and provide statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO), requiring the Trust to be consulted by local authorities on planning applications which include ‘development involving any land on which there is a theatre’. This includes any existing building or part of a building constructed wholly or mainly for public performance, for example theatres, arts centres, ciné-varieties, purpose-built and converted buildings, new theatres, and important historic theatres in other uses or disused.</p> <p><b>Comments:</b> The Trust agrees that <b>Policy DM S12 Loss of Existing Social Infrastructure Provision</b>, needs to be updated to current reflect guidance about the promotion of culture in the NPPF and London Plan. Paragraph 156 and 70 of the NPPF require the local plan to include policies to promote and protect cultural facilities. In particular,</p>

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		<p>Para 70 states that to deliver the social, recreational and <i>cultural facilities</i> and services that the community needs, planning policies and decisions should <i>guard</i> against unnecessary loss of valued facilities. Also to ensure that established facilities and services are <i>retained</i> and able to develop for the benefit of the community.</p> <p>The London Plan's Policy 4.6 also seeks to protect and enhance arts, culture, sport and entertainment facilities.</p> <p>We would recommend renaming the policy to 'Protection of community (and cultural) facilities' and the use of this description for the term 'community facilities' in the Glossary and accompanying text that would obviate the need for specific examples and recommend: <i>community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community.</i></p> <p>The Trust usually recommends the following policy wording, which I include for your consideration:  Protection of community facilities  The council will resist the loss or change of use of existing community facilities unless replacement facilities are provided on site or within the vicinity which meet the needs of the local population, or the necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no community need for the facility or demand for another community use on site.</p> <p>In regards to the wording of the proposed policy, we caution against the use of 'viable' as many community and cultural facilities are run by charities, community and volunteer groups and are not considered 'viable' in developer terms, but are essential community infrastructure for the health and well-being of local communities. We recommend use of the phrase 'there is no longer a community need', rather than the term viable.</p> <p>We also recommend policy DM TC 5 relating to town centres is also updated to support and protect community and cultural facilities.</p>
13.	Neil Wilton	<p><b>DM DC 1 Design Quality - identifies Whitton, East Sheen, Teddington as potential for taller buildings in town centre locations.</b></p> <p>Where in Whitton would a site be reasonably available for 'taller' development – up to and including five storeys? There are none and identifying Whitton is illogical and contradicts previous planning decisions. For example : The original 'Sainsbury's Local development' scheme/design @ 53-55 High St Whitton refused consent was reduced in height and massing as it was over-bearing/too tall, with a fourth floor!! A mansard roof extension creating a fourth floor level to 34-36 High St was refused as over-development to a host building(BTM) due to its location in a more prominent position. None of the pre-existing buildings are more than three storeys high, apart from those few toward the station end as the ground level rises, that have had a retro-fit mansard roof extension set back from the front elevations, so not to impact on the street-scene. So all four storeys or less, therefore not 'taller' as defined. These mansards are virtually 'invisible' to the street-scene@ the developments who secured planning consent. The community did not request 'taller' developments within the Whitton/Heathfield Village Plan consultations as it was not appropriate and there is no mention in the Village SPD.</p> <p><b>1. CP5 – Sustainable Travel 5.C Cycling and Walking London Plan policy 6.9 (Cycling) sets out specific requirements for developments to provide secure, convenient and accessible cycle parking facilities in line with London Plan standards or higher.....</b></p> <p>Whitton High St has insufficient cycle parking distributed throughout, even following the Whitton Uplift programme. I am convinced there is less than there was prior to Uplift and they are definitely not distributed adequately? Bikes are consistently secured to street furniture and bearing in mind the increased use of cycling as a mode of transport this needs to be reviewed locally.</p> <p><b>2. CP7 Maintaining and Improving the Local Environment</b></p> <p>"Setting out the positive strategy for the historic environment - reflecting guidance on how the historic environment can make a</p>

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		<p>positive contribution to achieving good design”</p> <p>This needs to be very proactive and positive to reflect the 1920's/30's heritage of much of Whitton's development between the wars. For example, too often commercial shop frontages/ signage is standard corporate/non-traditional materials which is at variance with underlying policy yet planning officers consistently do not have any meaningful regard to the heritage elements when assessing design/materials but ONLY regard to what is existing before Shopfront SPD 2010 &amp; Heathfield Village Plan SPD 2014 were adopted. Similar issues exist with residential developments. This planning view needs to change to encompass the above. Heritage needs to be the default position in assessing design and only then will the cycle of adverse decisions be broken in NOT measuring against existing contemporary design which is at variance not only with the Village Plan but also the spirit of it. I have therefore regretfully concluded the Village Plan SPD is ineffectual in supporting the local inter-war heritage/design and material elements and is pretty worthless as planning document as a material consideration in determining planning applications.</p> <p><b>3. S5. Sites to be allocated for development</b></p> <p>Since the call for sites and over the last couple of years, Turing House Free School, through the EFA with the co-operation of this council having been identifying potential permanent sites for the school and none of this has been included in the site allocation plan only the Richmond College site Ref : 5.1.7 Overview map of sites to be allocated for development. No prospective school sites are included in Heathfield/Whitton. And now of course the proposed MOD disposal of Kneller Hall and the substantial associated land surrounding it for residential use, which is designated MOL.</p> <p><b>4. CP18 Education and Training</b></p> <p>It was announced some months ago that MOL land( more than 0.25 hectares) off Hospital Bridge Rd within Heathfield Ward had been 'secured' by the EFA for Turing House free school subject to planning consent. However this is in contradiction to some extent to the existing education school places strategy, <b>that there are sufficient school places in the west of the borough until 2025.</b> As a rule MOL has significant planning protection and therefore this potential development would conflict with national and local planning policies. Development on this site would be a major departure from planning policy and incompatible with the Secondary Schools Places Strategy 2015. See : <a href="http://www.richmond.gov.uk/background_paper_education.pdf">http://www.richmond.gov.uk/background_paper_education.pdf</a></p> <p>“The Council has a duty under section 14 of the Education Act 1996 to ensure that sufficient schools are available for their area for providing secondary education. Although demand is expected to increase towards capacity by 2016, it is not forecast to exceed it at that point. At this stage, it is difficult to envisage when, if at all, demand will exceed capacity. As the educational landscape is fast changing, particularly in regard to free schools, many possible developments could take place over the next few years and it is therefore difficult to forecast demand for secondary school places as accurately as is the case at primary level. A working assumption is therefore that there will be a need for a new non-faith school within the Site Allocations Plan period, and the Council has therefore recently been consulting on enabling one at Richmond upon Thames College's site in 2017” No other sites to the west/Middx side are mentioned.</p>
14.	Peter Britton	As a resident of Martingales Close I wish to strongly support the proposal to designate the Convent garden an Other Open Land of Townscape Importance.
15.	Fiona McDaniel	<p>I wish to <b>support the proposal that the site of St Michaels Convent, Ham Common, be designated as Other Open Land of Townscape Importance (OOLTI)</b>. This is as proposed in the LB Richmond upon Thames – Local Plan consultation document dated December 2015.</p> <p>Having visited the grounds of the convent on a number of Open Garden days I have found it to be unique. It provides a habitat for a rich diversity of wildlife, which should be maintained at all costs. Rotting and decayed trees are homes for the endangered stag beetle, amongst others. At night owls can be heard and badgers are in evidence.</p> <p>While commercial development of the site is inevitable, special consideration should be given to preserving as much of the natural</p>

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		habitat as possible.
16.	Bryony Lodge	I have seen the council's site allocation consultation of December 2015 and wish to register my support for the proposal to designate the gardens of St Michael's Convent as Other Open Land of Townscape Importance.
17.	Karen Skipper	As a resident of Martingales Close, Ham, I am writing to express my strong support for designating the gardens at St Michael's Convent Other Open Land of Townscape Importance as proposed in the council's site allocation consultation.
18.	Mr Murray Smith, Dunphys Chartered Surveyors obo St. Clair Business Centre	<p><u>St. Clair Business Centre Hampton local plan review</u></p> <p>Further to the above I confirm we are instructed by the freeholders of this property to comment on the property in relation to the review of the Local Plan. St. Clair Business Centre is located on a backland site adjoining residential properties and with access via a relatively narrow residential side road. It includes a number of buildings which are vacant and which have become obsolete and beyond physical or economic rehabilitation.</p> <p>A planning application was submitted last year for the redevelopment of the whole site with a mixed commercial but predominantly residential scheme and was sympathetically received by your Planning Department. The application was withdrawn in June 2015 simply to allow design amendments suggested by your Planning Department but the principle of the proposed scheme appears to be accepted and a revised application will be submitted in the near future.</p> <p>Whilst inevitably planning policies are bound to conflict when it comes to the competing demands for housing and employment uses, it would appear that your planning department recognises the benefits of a predominantly residential redevelopment scheme for the site in view of the age of the buildings and the site's location to a sufficient degree to favour the property's reallocation regarding future land use.</p> <p>In view of the above it is suggested that this proposal is noted in your review and the appropriate adjustments made regarding emerging site allocations.</p>
19.	James Lloyd, James Lloyd, Associates Limited obo Tyton Properties Limited	<p>We note the Council has started the process of reviewing existing planning policies within the adopted <u>Core Strategy</u> (2009) and <u>Development Management Plan</u> (2011) as well as considering the allocation of key sites for development.</p> <p>The owners (Tyton Properties Limited) would like to be involved in the review process and provide their thoughts on St Clares Business Park being proposed as an important business park.</p> <p><b>Background</b></p> <p>It should be noted that previous written representations on the Pre-Publication – Consultation on New Education Sites was submitted via e-mail dated Mon 06/10/2014 12:04 (attached for ease of reference). The previous representations provided comments on the allocation of the site as a potential infant, junior or primary school that was subsequently deleted.</p> <p>An Outline Planning Application was submitted to the Council on 18 February 2015 and validated on 6 March 2015 (Number: 15/0621/OUT) for the: <i>“The redevelopment of the whole site for a mixed-use scheme comprising demolition and conversion of the St Clare Business Park, Hampton Hill for the erection of up to 116 homes (inclusive of support accommodation) of varying tenure together with up to 1,790 GIA square metres (sq.m) of commercial (Use Class B1) floorspace including care communal accommodation and training, creation of a new vehicular access from Windmill Road, provision of parking and refuse facilities, and associated works. (Consideration of Access; Layout; Scale Only).”</i></p> <p>Web link: <a href="http://www2.richmond.gov.uk/lbrplanning/Planning_CaseNo.aspx?strCASENO=15/0621/OU">http://www2.richmond.gov.uk/lbrplanning/Planning_CaseNo.aspx?strCASENO=15/0621/OU</a></p> <p>We concluded that: There is satisfactory evidence of completion over an extended period of time of a full and proper marketing exercise of the site at realistic prices both for the existing use and for redevelopment for other employment uses, or suitable alternative. A sequential approach has been applied to the development of the site, demonstrating that:</p> <ul style="list-style-type: none"> <li>• Neither a 'pure' employment scheme nor a mixed use scheme which retains the same amount of employment floorspace as at present would be viable; but that A residential-led scheme which includes a significant proportion of affordable homes,</li> </ul>

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		<p>employment uses and employment-generating uses, would be viable</p> <ul style="list-style-type: none"> <li>The site, whether in its current form or redeveloped, is largely unsuitable for modern day industrial/warehouse use and for large-scale office development.</li> </ul> <p>In summary, the proposed development satisfies the first two criteria of Policy DM EM 2 and satisfies the third in relation to industrial/warehouse uses and large-scale office development.</p> <p>More importantly, the site has a Public Transport Accessibility Level rating of 2, which is poor. The access and servicing arrangements for the site amount to severe restrictions that would render its continued use for employment purposes untenable; and that while this site is reasonably accessible by public transport, it is clearly less accessible than a town centre employment site. Furthermore, the buildings that currently stands on the site are dated and somewhat careworn, set in unkempt grounds within a residential area.</p> <p>This was acknowledged by the Council.</p> <p><b>Proposed Change – Mixed-Use Development</b></p> <p>The comprehensive mixed-used development of the site would meet other policy burdens, such as affordable housing and useable commercial floorspace including the delivery of public open space.</p> <p>The National Planning Policy Framework (NPPF) identifies that to ensure viability, the costs of any requirements should, when taking into account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable development to be deliverable.</p> <p>It is considered that the current identification of the site, as an important business park is too rigid and introduces a risk to the deliverability of the allocation through potential lack of support from a willing freeholder and / or willing developer. This a result of the highlighted imposed without any flexibility for their delivery to be subject to viability testing at the planning application stage.</p> <p>Overall, it is considered that in order for the site allocation to be considered sound, additional flexibility should be provided that identifies the site's redevelopment and associated infrastructure requirements will be subject to viability testing at the planning applications stage. To make the policy sound it is suggested that the following changes are made to the wording of the site allocation:</p> <p><b>“Site Allocation: St Clares Business Park, Holly Road, Hampton</b></p> <p><i>A Comprehensive mixed-use development to provide a strategic housing development and other compatible uses relative to accessible open space. The provision of infrastructure within the site will be subject to testing through an individual viability assessment as the planning application stage.”</i></p> <p>What are the design principles for the site?</p> <ul style="list-style-type: none"> <li>Development should respect and be informed by the existing character, scale, height, massing and urban grain of the surrounding built environment and its 'local' centre location</li> <li>Development should be stepped back from the railway line were appropriate</li> <li>Walking and cycling connections should be improved to, from and created within the site. These routes should align with the existing urban grain where appropriate to supper permeability and legibility</li> </ul>
20.	Ham & Petersham Association	The Ham & Petersham Association welcomes the Site Allocation descriptions for the cassel Hospital and St Michael's Convent. In line with our previous support for the designation of St Michaels's as an OOLT I we strongly support this as it presents a valuable community asset.
21.	Andrew Payne, Greater London	As you are aware, all development plan documents have to 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 comments on his behalf

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	Authority, Mayor of London	<p>on the emerging DPD. Representations from Transport for London which I endorse, will be sent separately. My comments are broader, given the nature of the document.</p> <p><b>Sustainable Development, climate change, pollution and waste</b></p> <p>The Local Plan consultation notes the National Planning Policy Framework's reference to 'sustainable development' covers economic, social and environmental aspects of development. Richmond proposes to use the term 'sustainable construction' however the Housing Standards review seeks to limit the role of planning in construction and therefore it may be more appropriate to use the terminology 'sustainable design and construction' within the Local Plan. The Mayor welcomes the proposals to recalibrate the carbon dioxide reduction targets set out in policy 5.2 of his London Plan, and adopt the optional higher standard for water efficiency. In this regard the evidence the Mayor prepared for his Minor Alteration of the London Plan (MALP) (Housing), and for water was found to be proportionate and sufficiently robust by the Inspector, will support the proposed approach. The borough should include an approach to carbon dioxide 'off-setting', in line with the Mayor's Sustainable Design and Construction Supplementary Planning Guidance, if it does not already have such an approach.</p> <p>The Mayor would welcome the inclusion of robust policies on all sources of flooding and sources of pollution.</p> <p><b>Town Centres</b></p> <p>The town centre health checks that will be coordinated by the Greater London Authority during 2016 will help inform the Borough's town centres policies. It is likely the health checks will cover:</p> <ol style="list-style-type: none"> <li>1. Scale and function (includes data on vacancy)</li> <li>2. Development trends and capacity</li> <li>3. Financial performance</li> <li>4. Accessibility and connectivity</li> <li>5. Town centre strategy and management</li> <li>6. Community Safety</li> <li>7. Environment and heritage conservation</li> </ol> <p>The Mayor will generally be supportive of policies that manage clusters of uses having regard to their positive and negative impacts in line with the wider objectives in the London Plan, including those set out in policy 4.8(Bg). Richmond will also need to consider, in line with policies 2.15 and 3.3 of the London Plan (discussed in more detail below), if and how its Town Centres can accommodate additional housing.</p> <p><b>Natural environment, parks, open spaces, rivers and sport and recreation</b></p> <p>The Mayor would welcome a policy that would continue to protect Metropolitan Open Land, in line with Green Belt policy, as set out in London Plan policy 7.17 as well as a green infrastructure approach to open space as set out in London Plan policy 2.18. He would also welcome policies that more closely align sport and recreation with health.</p> <p><b>Housing</b></p> <p>The Mayor welcomes the recognition that Richmond's Local Plan will have to reference its minimum housing monitoring target set out in table 3.1 of the London Plan (2015). However, in line with policy 3.3, this is a minimum figure and the borough should seek to bring forward additional housing development capacity to supplement its housing target to meet local and strategic need.</p> <p>Richmond's consultation documents point to the Inspector's report for the Further Alterations to the Local Plan which suggested that boroughs only need to do some 'fine tuning' regarding local need relating to the size and type of property and tenure and that there is no need for them to duplicate the Mayor's assessment of overall housing needed (the SHAM). Irrespective of the position taken by the inspector, London Plan policy 3.3 and paragraph 3.19i still require boroughs to seek to augment targets to address need in terms of the wider London Plan and NPPF (paragraph 14 and 47). It is therefore welcomed that Richmond have stated that its</p>

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		<p>housing target will be informed by an up to date borough SHMA. The minimum supply targets set out in table 3.1 of the Plan should be supplemented with additional housing capacity from the types of location outlined in London Plan Policy 3,3E in order to close the gap between identified need and capacity.</p> <p>Policy 3.3E of the London Plan identified the types of locations which are anticipated to provide a substantial increment to housing supply in London. These include town centres, surplus industrial, commercial and public land and other large sites, especially near transport nodes as well as general intensification and sensitive intensification of residential areas, especially in areas of good public transport accessibility. This should compromise a pro-active and targeted re-appraisal of a borough's SHLAA findings, drawing on scenario tests, supplemented by more local sensitivity testing. The borough will have to satisfy itself it can demonstrate it has looked at all options for housing delivery in order to meet demand and to protect other designated land.</p> <p>The Mayor welcomes the consultation's acknowledgement that Richmond should plan for a range of housing types and needs, including housing for older people. In this regard, the revised Local Plan should identify and set policies to address the need for specialist older person's accommodation and this should be informed by Richmond's indicative annualised strategic benchmark for specialist housing for older people set out in Table A5.1 of the London Plan.</p> <p>The Mayor would welcome policies that protect or promote locally and strategically important employment and industrial premises or areas. In this regard it is noted that the London Plan (Annex 2) identifies Richmond town centre and Twickenham district centre as having the potential to accommodate speculative office space in the most accessible locations. However, this might entail some long-term loss of overall office stock on less attractive sites.</p> <p>The Mayor will issue his formal opinion on general conformity when requested at the pre-submission stage. However, I hope that these comments can inform the development of Richmond's Local Plan.</p>
22.	Kevin Scott Consultancy obo Port Hampton Estates Limited (Platts Eyot)	<p>We represent the owner of Platts Eyot, Port Hampton Estates Limited. We wish to make the following comments in respect of the Local Plan Public Consultation Documents.</p> <p><b>Previous Representations made to the Site Allocations document 2013 and 2014</b></p> <p>We have previously made the following comments in respect of the Site Allocations document insofar as far as it related to the Platts Eyot site:</p> <p><i>"We broadly support the aims of the Site Allocations Plan in respect of this site. Clearly the historic significance of the Eyot and its importance as an employment site are key aspects of its unique character. The principle of allowing some residential development to create a mixed use development which is sympathetic to this character is also welcomed. Where we have some concerns is with the potential restrictions/contradictions set out in the text regarding the nature of the potential residential use. The SAP recognises that the residential development has a key role to play in terms of the long term viability of the site. This is particularly important in forming a viable plan for the long term maintenance and restoration of the historic elements. The policy should not seek to restrict the potential housing by focusing too closely on live work units.</i></p> <p><i>The reference to resisting commuter housing is unclear and unhelpful as it seems to seek to create a distinction in the C3 Use Class that is not supported by the Town and County Planning (Use Classes) Order 1987 (as amended).</i></p> <p><i>The characteristics of the island such as the access provisions and its location will ensure that the residential development will have a particular character that will not have the more universal appeal of a the more usual housing scheme within the borough. The same is true of the impact the characteristics of Platts Eyot will have on overall numbers in that they will impose a check to unlimited development. This is already partly recognised in the reference to restricted access and the need to provide safe access in the text. The Council should not seek to restrict the residential use further. We would welcome the opportunity of working with the Council to develop a Masterplan for Platts Eyot.</i></p> <p><b>Changes</b></p>

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		<p><i>The text should be amended to remove the reference 'to (not) providing solely for commuters'. The potentially important role of residential development in securing the long term future of the site should be given greater prominence."</i></p> <p>These representations resulted in a proposed change to the pre-publication Site Allocations Plan published in February 2014. The following amendments were proposed:</p> <p><b>Current Review Document</b></p> <p>The current Local Plan review document has reverted to the original wording of the allocation for Platts Eyot which we consider may jeopardise Richmond Borough Council's desire to see the island economically regenerated. We wish, therefore, to reiterate our previous comments and take this opportunity to draw your attention to the following:</p> <p>Port Hampton Estates acquired Platts Eyot in early 2013 and has since been addressing immediate property management issues as previous owners had neglected the island. In particular, we have received Environment Agency consent to repair the sheet piling and moorings, walkways to the entire island periphery and Planning Consent to pile the remaining section of the unprotected river bank.</p> <p>In 2015 Port Hampton Estates acquired about 1 acre of land from Thames Water on the Lower Sunbury Road bank, incorporating the car park land, bridge access and other land in order to facilitate the regeneration of Platts Eyot.</p> <p>We subsequently met with representatives of Richmond Council in June 2015 on site at Platts with a view to preparing a site brief in consultation with the Council. Port Hampton is now addressing the future of Platts Eyot and has produced a draft development brief focussing on the viability and regeneration of the island, its listed buildings, buildings of townscape merit, boat building and repair businesses, slipways, leisure and B1 uses and the moorings noted to be of importance in the Conservation Area study. Several architectural practices have attended on site and provided development ideas.</p> <p>In order to reverse the economic decline of Platts Eyot and to in order justify a substantial financial commitment, not only to the historic fabric of the island, but also to the failing infrastructure including the sheet piling and utility provision, Port Hampton would now welcome the opportunity of consulting with the Council with a view to achieving all of the above with enabling residential development. Therefore, in the current review document we request that reference to 'live work' units is removed along with reference to commuters and wording inserted as previously agreed in order that a development brief can now be brought forward in consultation.</p>
23.	Jonathan Stobbart, CBRE on behalf of The Laboratory of the Government Chemist	<p>We write on behalf of our client LGC and in response to the above consultation.</p> <p>LGC was founded in 1996 following the privatisation of the Laboratory of the Government Chemist. The company's headquarters is located on Queens Road in Teddington; a site plan is enclosed (herewith known as 'the site'). The site is incorrectly identified within the consultation draft plan under the demise of the National Physical Laboratory, Hampton Road, Teddington (p56).</p> <p>The document seeks to protect the overall LGC site for 'proposed protection of key employment land'.</p> <p>On behalf of our client we are seeking to remove the LGC site from the proposed employment allocation, and therefore formally disagree with the indicative identification of the NPL site as shown in Appendix 3 of the Local Plan consultation document. LGC's Teddington site is increasingly becoming unfit for purpose due to significant changes in LGC's business model, but more critically as a result of changes in customer requirements and the evolution of scientific techniques.</p> <p>Due to the original design and construction methods used, the building has a higher operating cost than any other UK LGC site, which is unsustainable in the medium to longer term. These higher operating costs and inefficiencies are due to the facility originally being designed and built for wet chemistry laboratory operations. Over time, these scientific methods have changed considerably, particularly with the introduction of instrument based analytical methods (e.g. liquid &amp; gas chromatography and mass spectrometry etc). Therefore, the site in its current form is now constraining LGC's operating model in Teddington rather than enabling delivery of the objectives that LGC wishes to achieve.</p>

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		<p>The site remains an important facility to LGC with its large local workforce and it is LGC's intention to retain the site as its group headquarters and part of its UK laboratory operations. However, we respectfully request that a new mixed-use site allocation is identified in the emerging plan.</p> <p>The cost of upgrading the facilities is extremely high and a large portion of the site is potentially surplus to requirements. An initial evaluation of options has established that a part of the site can be brought forward for residential uses, with the remainder being used for developing a new purpose built facility on-site. We are keen to meet with the local authority in order to work through the potential options and set the parameters for housing numbers and employment floorspace.</p> <p>In our view, the site lends itself well to a mix of employment and residential uses with the introduction of residential schemes off Bullard Road and the established housing on Coleshill Road. Indeed, two recent residential schemes included properties formerly owned by LGC on Queens Road (Elms Lodge and Victoria House). It is considered that car parking and site security can be addressed and there is no barrier to delivering a mixed use scheme in accordance with the National Planning Policy Framework. It should be remembered that the UK Government originally invested in Teddington to be a home to world class scientific facilities and this investment was partly funded through the release of land for residential development. This investment enabled the creation and maintenance of high technology employment in the borough which LGC require options to maintain in order to sustain state of the art facilities to attract and retain the required calibre of scientific talent. The Teddington site has a rich scientific heritage and reputation and imposing planning constraints can only place this at future risk.</p> <p>In summary, a proportion of the site is no longer required by LGC, whilst the facility requires substantial modernisation and structural change. It is therefore proposed that a mixed use residential/employment allocation would allow LGC the opportunity to have a presence in the area for the longer term</p> <p>We respectfully request that you acknowledge that these representations have been received and shall be formally considered as part of this consultation process. If you require anything else please do let me know.</p> <p><i>See the Appendix (1) to this document for Boundary Definition map.</i></p>
24.	Jan Gare, Ham Library Friends Group	<p>Ham already has an excellent, well-used library interlinked with its "community space" set in an award-winning community garden in a prime location within the Ham Street sub-area of the Ham House Conservation Area. Less than three years ago, £146,000 was spent in "uplifting" Ham Library and has resulted in creating a very successful, much-loved facility. It does not need relocating. The Ham Library site is quite rightly not included within your proposed site allocation area, although it is anomalously included within the Ham Close Regeneration area to which you refer as being subject to a more detailed consultation exercise. That consultation exercise delivered the overwhelming view from the Friends of Ham Library, representing the library users, that the library should be retained on its existing site and should not be relocated into the community centre proposed for the Ham Central Area.</p>
25.	Andy Sutch, Sport Richmond	<p>Sport Richmond is the independent forum for community and voluntary sport in the borough and has contributed consistently to needs analyses and subsequent borough plans around sport and open space and the borough consultation on strategic principles for sport and fitness as well as numerous individual planning applications affecting sport and recreation.</p> <p>Sport Richmond welcomes the opportunity to comment overall on this local plan consultation and to make specific references to some sites.</p> <p>The Open Space, Sport and Recreation needs and Opportunities Assessment last year was welcomed by Sport Richmond and the key findings supported. However this has to be viewed in the light of the new Government Strategy for an Active Nation and any subsequent emerging strategy from Sport England and any subsequent pan London proposals from London Sport.</p> <p>Sport Richmond notes that in 4.5.10 LB RuT do not intend to review MoL and Green Belt designations and welcomes this as a default position in the context of existing community use at Udney Park and Stag Brewery. Whilst there may be sites where an exchange of designated areas of MoL or a small encroachment can deliver significantly improved opportunities for sport and</p>

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		<p>recreation but these must always meet the minimum recommendations of Sport England.</p> <p>In particular the new government strategy identifies the need to increase the number of people playing sport, something at which the statutory/ voluntary sector partnership has done well over the last 10 years in LB Richmond but the new strategy gives priority to those groups in the community that tend not to take part in sport (women and girls, disabled people, lower socio economic groups and older people). It also has a focus around outcomes such a physical and mental wellbeing, and social cohesion.</p> <p>To that end the strategy instructs Sport England to look wider than the traditional sports that have been the focus of the past 15 years and that is a change that the existing local plan documents will need to be aware of rather just the list of sports presently included when policies are updated.</p> <p>Sport Richmond has a particular concern regarding the approach to the determination of planning application for the lighting of sports facilities. It does believe that the policy applied to recent applications has taken insufficient note of the Council's Playing Pitch Strategy and the recent emphasis on the importance of physical activity for those aged over 40 as well as young people. The absence of lit outdoor facilities means in effect no weekday opportunity for participation by adults in employment. It welcomes the recognition of the need to light the second hockey pitch at Teddington School and at Orleans Park. Provision of adequate lighting for training and community use should be the default position for investment in all future all weather pitches.</p> <p>Sport Richmond supports the site specific developments at St Mary's College, Pools on the Park and the Richmond Athletic sites, the boat house restoration on Platts Eyot and development at Harlequins and the RFU. At Richmond College any loss of playing fields must only relate to provision of a large (double size) fit-for- purpose sports hall. Sport Richmond would support an investigation of possible sport and leisure use of the Central Depot site as outlined on page 37.</p>
26.	Bryce Tudball, Royal Borough of Kingston	<p>We are generally supportive of the scope and rationale of the review and do not wish to provide any detailed comments as part of this consultation. The Royal Borough of Kingston is committed to discharging its responsibilities under the Duty to Cooperate and seeks to engage with the London Borough of Richmond on an ongoing basis, particularly in relation to strategic and cross boundary issues.</p>
27.	Andrew Barnard	<p>I am fully supportive of the proposal to designate the gardens Other Open Land of Townscape Importance, particularly as the listed building on the site will need to be retained. The gardens are a long-established feature of this period property and benefit the local area as a whole.</p> <p>The existence of a listed building means that any future redevelopment will need careful consideration. In addition I note that the site is well served by the two existing entrances facing on to Ham Common.</p>
28.	Margaret Simpson	<p>We are broadly sympathetic to the proposals for the development of this site as indicated by the bullet points, page 47. These points reiterate possibilities outlined in previous documents however, and we would welcome information as to when these suggestions will be particularised. Our immediate concerns relate to whatever form development takes and are as follows:</p> <p><b>1 Traffic management on Ham Street</b></p> <p>Traffic along Ham Common to Ham Street will have to be very carefully managed. This road is only the width of two cars, and, at present, congestion often causes vehicles to mount the pavements and grass verges opposite the Common, and on the edge of the Common itself. Many of these are large vehicles servicing building works, local shops, Greycoat School, the Palm Centre and Ham House. Around eight-thirty and three-thirty, this traffic is heavily augmented by cyclists and pedestrians attending Greycoat. The situation is aggravated by vehicles parked on Ham Common, some for periods of more than a week, and coaches often for a whole day. Pollution, noise, and the environment generally will worsen if some systematic control is not exercised over access to the Cassel site both during and after the site development. There may also be increased danger to those attending Greycoat, and educational or community activity in the developed site.</p> <p>One possibility raised by the Ham and Petersham Neighbourhood Plan is for a road through the Cassel site which would link Craig</p>

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		<p>Road and Ham Common. Such a road could become a run-through for traffic avoiding Ham Parade, but, in any case, would exacerbate the situation outlined above. Whichever plan is adopted eventually, the arrangements for access to and egress from the Cassel site will have to be carefully considered as the change of use will impact strongly on an already much-used thoroughfare.</p> <p><b>2 Trees in the Cassel site, particularly those adjacent to Langham House Close</b></p> <p>At present, residents and offices in Cassel House <i>and</i> the flats and houses in Langham House Close benefit from a screen of well-established and attractive trees which are carefully managed by the estate. There is a risk that developers would cut down these trees in order to extend accommodation and service blocks, or provide car parking. We have read of cases where developers have removed in a few hours trees that have grown over scores of years, because they are willing to pay whatever fines are imposed after their actions. Even if further development is then prohibited the damage has been done. Such a removal would seem to us to be go against DMDC4, the Council's Trees and Landscape policy referenced in the Consultation Document Policy, and also the London Plan Policy 7.21. We would urge the Council to be <i>extremely</i> vigilant about all the trees on the Cassel site. They contribute enormously to the congenial appearance of this location and are known to be environmentally desirable.</p>
29.	Richard Geary	<p>I have read the documentation on the website and my comments refer specifically to point 1.2.2 (page 4) the review is intended to “take account of the Council’s approach towards village planning and associated Supplementary Planning Documents (SPDs), which focus on locally specific guidance on design and character; Ensure matters and issues raised by the local community as part of the Council’s village planning process are considered” and would be as follows:</p> <p>I haven’t seen much due regard for local residents over the past twelve years in the area between the railway and the A316, specifically around Crown Terrace / Sheendale Road, Victoria Villas TW9.</p> <p>There has been an Area Plan in place that states no development in this Conservation Area should be over three storeys high. A one-story building called Elephant House was subsequently replaced. The current height of the development is now FIVE stories. Recently balconies have been added and a change of land use so that homeowners there in the future will be able to see straight in to our bedrooms and lounge. Would this have received approval if the development was next to a home owned by the local MP, Councillors or those officers advising the Planning Committee? I think that this is very unlikely.</p> <p>If the Area Plan can so easily be ignored what is the value of having any Area Plan? How much money is wasted on salaries in the Planning Department, wages paid by local residents?</p> <p>How is it that when we applied to park our car in our front garden we were refused because we live in a Conservation Area but such considerations do not apply to developers?</p> <p>Why do you publish the names and addresses of those that contact you on planning matters on your website which then leaves open the prospect of intimidation from those who do not agree?</p> <p>You ask on Page 25 of the document for details of “key sites in the borough that should be considered for allocation of homes because they are more than 0.25 hectares in size; would provide ten or more homes”. There are hundreds of such sites around the borough and all such sites should be considered before there is any further development around Dee Road, Crown Terrace, Victoria Villas.</p> <p><i>See the Appendix (5) to this document for photo attached.</i></p>
30.	Kevin Rice	<p>I would like to comment as a resident and as a member of the Hampton Society planning sub-group in respect of the scope of the Local Plan review. Given the Council's commitment to the Village Plan process in the Borough and the preference for and expectation of considerable engagement with local residents, I would like to see a formal connection between the Local Plan implementation and Village Planning process going forward.</p>

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		<p>Whilst I am open to how this might be achieved, I would like to think the Council would provide an annual report on the impact of the Local Plan strategy on each village, the issues, the outcomes, the funds raised from planning consents and grants plus any expenditure or investment undertaken. Any new issues could obviously be identified as they arise. Similarly where issues are identified and solutions are agreed under the Village Planning process, prior to the completion of the Local Plan review; the appropriate policy statements are included within the revised Local Plan whether directly or by reference to any Supplementary Planning Document. With regards to the Sites allocated for Development in Hampton, I would wish to see the four sites identified, Hampton Square, Hampton Traffic Unit (now former), Hampton Delivery Office and Platts Eyot remain as key sites though with suitable updating after a review.</p> <p>In addition I believe the following sites should also be included;</p> <ol style="list-style-type: none"> <li>1. Alderson's Garage &amp; Peco's showroom, 139-143 Station Road, Hampton plus 52 &amp; 54 Station Road. (Currently the subject of a planning appeal.)</li> <li>2. Kingsbury's Motors site, 45-49 Station Road, Hampton. (Currently the subject of a planning application.)</li> <li>3. Former Yates Garage, 9 Tudor Road, Hampton</li> </ol>
31.	Laura Morgan	Having read the documentation it is my view that the local plan should specify that no schools, hospitals, care homes or other similar facility should be built in areas which exceed the Air Quality Objective.
32.	Jane Harrisson	You have successfully managed to make your report as incomprehensible as possible. The only thing I can partially understand is that the Lower Mortlake Road has the worst air quality of all the tested areas in the borough. Might I suggest that no more schools, hospitals, old folks homes etc be built along this filthy corridor?
33.	Jane Morrisson	<p>We would like to confirm that our comments made at the time of the previous consultation still stand, namely that we support whole heartedly the suggestion that gardens should be afforded the status of Other Open Land of Townscape Importance as they continue to clearly meet the criteria for such as set out in the Council's policy, ie</p> <ul style="list-style-type: none"> <li>• Contribute to the local character and/or street scene, by virtue of its size, position and quality</li> <li>• Value to local people for its presence and openness</li> <li>• Immediate or longer views into and out of the site, including from surrounding properties</li> <li>• Value for biodiversity and nature conservation.</li> </ul> <p>Having been maintained over the years to a high standard there is historical interest in layout of the kitchen garden, the orchard and greenhouse containing an old vine. The gardens offer a haven for diverse flora and fauna and I believe the secluded ponds provide habits for newts, frogs and many other insects and animals. Foxes, badgers, and a wide variety of birds live within the gardens and the mature trees provide Martingales Close with its unique character.</p> <p>With regard to the use of the site generally and development of the buildings this should be in keeping with the local character of the immediate area and kept to a minimum to ensure the gardens and boundaries are protected.</p> <p>We trust these views will be taken into account as part of the consultation process.</p>
34.	Mary Stephens	<p>I have two concerns:</p> <ol style="list-style-type: none"> <li>1. There appears to be a severe shortage of social housing and affordable housing, and an excess of luxury housing in the Borough. Why can this not be addressed now as a matter of urgency?</li> <li>2. There appears to be a lack of strong action to take action to limit pollution in the Borough. I am 75 years old now, and recent publicity has indicated that air pollution is a major factor impacting health of residents, particularly the elderly and the very young. It appears from your information that safe levels have been exceeded.</li> </ol>
35.	Paul Lapham	As local residents we are aware of, inter alia, the need for an expansion of local infrastructure for schools and related services. I am

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		<p>also aware of the negative impact that environmentally unsuitable sites chosen for these purposes may have on the health of our young, old and vulnerable. We would, therefore, like to request the Council include in the revised local plan that schools, hospitals, care homes and suchlike are prohibited from being built in areas that exceed the Air Quality Objective.</p>
36.	Andree Frieze	<p>Please consider the following points with reference to the Local Plan review.</p> <p>With regard to sustainable development – in relation to the London Plan and the NPPF – as covered in section 4 of the Consultation document:</p> <ul style="list-style-type: none"> <li>• I would like to see Richmond Council continue with the Zero Carbon initiative for housing, that was planned to be implemented by 2016. For reference, I direct you to this website: <a href="http://www.zerocarbonhub.org/zero-carbon-policy/zero-carbon-policy">http://www.zerocarbonhub.org/zero-carbon-policy/zero-carbon-policy</a>. Headline statistics to consider are: “The <u>Energy Performance of Buildings Directive</u> [...] requires all new buildings to be nearly Zero Energy Buildings from 2020 (nZEB), as described in Article 2 of the EPBD.”</li> <li>• Failing this, adoption of Passivhaus building standards, should be introduced for all new buildings across the borough. For reference: <a href="http://www.passivhaustrust.org.uk/what_is_passivhaus.php">http://www.passivhaustrust.org.uk/what_is_passivhaus.php</a>.</li> <li>• All new buildings (commercial, leisure, residential, retail) should have Photo Voltaic panels fitted as standard. Owners of all existing buildings should be encouraged to have them retrofitted. For businesses, this could be reflected in lower business rates when these get passed over to local government. Twickenham Rugby stadium, Deer Park swimming pools, Richmond Station, all the schools in the borough are just some examples off places where these could ideally be sited.</li> </ul> <p>In order to tackle pollution, I refer you to the statistics on this site: <a href="http://lovecleanair.org/wp-content/uploads/2015/09/Richmond-air-quality-update-and-screening-assessment-2015.pdf">http://lovecleanair.org/wp-content/uploads/2015/09/Richmond-air-quality-update-and-screening-assessment-2015.pdf</a>, and I attach a graph which clearly shows that the average amount of NO2 measured in LBRUT regularly exceeded safe levels across 17 sites in the borough, with particular spikes in Red Lion Street and Lower Mortlake Road.</p> <p>To reduce this I would suggest the following measures:</p> <ol style="list-style-type: none"> <li>1. Improve cycling infrastructure – bike lanes and storage in to and out of railway stations. For example, to encourage cycling from Ham to Richmond station and vice versa, cyclists could be directed down Quadrant Road (against the one-way flow) on to Duke Street (against the one-way flow) and on to The Green towards the tow path, which could be marked to divide it between pedestrians and cyclists all the way till River Lane. Look at this page to see how protected bike lanes has an improved economic benefit for retail: <a href="http://www.peopleforbikes.org/statistics/category/protected-bike-lane-statistics">http://www.peopleforbikes.org/statistics/category/protected-bike-lane-statistics</a>. This website has more statistics backing this up: <a href="http://www.triplepundit.com/2013/12/bike-lanes-increase-small-business-revenue/">http://www.triplepundit.com/2013/12/bike-lanes-increase-small-business-revenue/</a></li> <li>2. Incentivise people to cycle into shopping centres by giving them 10% discount in local shops/discount in bike shops. Drivers get 30mins free parking which encourages people to drive.</li> <li>3. Introduce a cycle hire scheme at stations, prime residential locations and retails hubs across the borough (similar to the Boris bikes in central London)</li> <li>4. Start a campaign saying 'Richmond Welcomes Cyclists' and 'Richmond welcomes pedestrians'.</li> <li>5. Ban and fine taxi cabs from idling outside Richmond station - <a href="http://www.standard.co.uk/news/turn-off-your-engine-idling-cabs-targeted-by-eco-marshals-6446035.html">http://www.standard.co.uk/news/turn-off-your-engine-idling-cabs-targeted-by-eco-marshals-6446035.html</a> - “research shows black cabs create a quarter of PM10 emissions in central London – fine airborne particles linked to health and breathing problems – and up to 15 per cent of that pollution is believed to be caused by drivers leaving engines idling when parked.”</li> <li>6. Ban and fine drivers from idling unnecessarily, like Islington council has done – <a href="http://taxileaks.blogspot.co.uk/2014/08/islington-to-fine-idling-drivers-to.html">http://taxileaks.blogspot.co.uk/2014/08/islington-to-fine-idling-drivers-to.html</a></li> <li>7. Bring in car-free Sundays to Richmond town centre and other areas eg Barnes, once a month</li> <li>8. Introduce electric charging points in all car parks (street and off-road/supermarket) across LBRUT.</li> </ol>

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		<p>9. Encourage businesses to introduce car clubs and prioritise electric vehicles. Get them to put in car charging points in their car parks and replace a number of car parking spaces for cycle parking instead.</p> <p>10. Work with cab companies and bus firms to introduce electric vehicles throughout their fleets.</p> <p>11. Set up an electric hail-and-ride mini-bus service (that welcomes dogs) from Richmond and East Sheen stations to/from the gates to Richmond Park to encourage people to leave their cars at home.</p> <p>12. Start a campaign saying 'Richmond Welcomes Electric Vehicles'.</p> <p>13. Bring in 20mph across all roads in the borough, except major trunk roads eg A316, to improve safety, encourage people to walk/cycle (which is healthier) and reduce the amount of cars on our road. For reference:  <a href="http://www.20splentyforus.org.uk/Briefings/London&amp;20mph-Summary-20Mar15.pdf">http://www.20splentyforus.org.uk/Briefings/London&amp;20mph-Summary-20Mar15.pdf</a>;  <a href="http://www.southwark.gov.uk/info/100011/transport_and_streets/3431/borough_wide_20mph_speed_limit">http://www.southwark.gov.uk/info/100011/transport_and_streets/3431/borough_wide_20mph_speed_limit</a>;  <a href="http://www.southwark.gov.uk/info/200107/transport_policy">http://www.southwark.gov.uk/info/200107/transport_policy</a></p> <p>14. To protect the most vulnerable in our borough the revised local plan should specify that no schools, hospitals, care homes and similar facilities should be located at any site that exceeds the Air Quality Objective.</p> <p>15. The City of London has produced a useful document on ways businesses can be encouraged to reduce pollution:  <a href="https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Documents/improving-air-quality-city-of-london-retail-and-service.pdf">https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Documents/improving-air-quality-city-of-london-retail-and-service.pdf</a></p>
37.	James Sinclair, Teddington Society	<p>Please see below the response of the Planning Group of the Teddington Society to the Local Plan consultation ending on 1<sup>st</sup> February. The Group welcomes the proposal to combine the Core Strategy with the Development Management Plan.</p> <p><u>Historic Environment</u>  Para 4.2.4  We believe that the concept of buffer zones, as mentioned in the context of Kew Gardens, should be extended to conservation areas. It is often the case that development can have an adverse impact on a conservation area, without being located within it.</p> <p>Para 4.2.5  We consider that the Buildings of Townscape Merit designation is important in maintaining the character of Teddington. The paragraph suggests that such designations could be streamlined and consolidated; this could result in a significant dilution of their status, which we would oppose.</p> <p><u>Design and Character</u>  Para 4.3.2  Whilst the need to strengthen the focus on high quality design is welcome, we would like to see the scope of this extended to specifically refer to conservation areas. The Council should seek high quality design in conservation areas that will respect both their character and, particularly, the characteristics set out in the conservation area statement.</p> <p><u>Town Centres</u>  Para 4.4.3  The scope of this paragraph should be extended to recognise local distinctiveness, for example in Teddington High Street. This should reinforce any powers afforded by conservation area status.</p> <p><u>Natural Environment</u>  Para 4.5.1  The scope of this paragraph needs to be extended beyond the scope of national and regional guidance. Furthermore, we do not believe that a strategic framework is sufficient. It should be made quite clear that development in certain designated areas will not be permitted.</p>

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38.	Krystyna Kujawska SCAMPS	<p>We, at Scamps, appreciated the fact that Scamps is cited as an example of existing social infrastructure on this Strathmore Road site, which is on the list of sites considered for allocation in the Local Plan.</p> <p>Scamps is referenced as a <u>nursery</u> on page 33 of the Local Plan Consultation, and as such, according to point 4.8.2 of the consultation, we understand that the Council acknowledges the great need for such an organisation on this site. We have already provided a 'brief' of Scamps' exact needs in the event of the site's redevelopment, to Ishbel Murray, Assistant Director of Environment at LBRT. This brief thoroughly explains all the services that Scamps provides; but I thought I would just reiterate here that Scamps provides a <u>complete</u> range of child-care services for children up to and including Year 6, as well as acting as a nursery to pre-school aged children. Scamps runs a breakfast club from 7.30am and an after-school childcare service until 6pm enabling working parents to complete a regular working day. Scamps also runs full child-care provision during the school holidays. As well as enabling over 200 local families to go out to work, this essential (non profit-making) service also employs over 25 staff. Most of the local schools have had to expand to accommodate more and more children: Stanley School expanded to <i>four</i>-class entry a few years ago (and continues to expand) creating more need for affordable, accessible child-care in this area. Scamps' location in Strathmore Road – just across the road from Stanley School, and a short walk from St. James's and from Fulwell station – makes it a perfectly situated child-care provider for working parents with children at those schools.</p>
39.	Max Millington	<p>I write in relation to the pre-consultation in respect of existing local development plans, in particular as they pertain to Mortlake.</p> <p><b>1. BACKGROUND</b></p> <p>I am a resident of Williams Lane and live adjacent to the Stag Brewery site (the <b>Site</b>). I acquired the property on construction in December 2011, after publication of the materials referenced below and the public consultation which they followed. I made the purchase in reliance upon those plans, albeit recognising that the final details of any planning consent would need to be addressed at the relevant time. The location of the residences is set out in the Indicative Plan as 'Approved residential development'; the development on Williams Lane and Wadham Mews was completed in 2012 and is referred to in this letter as the <b>Trinity Mews Development</b>.</p> <p>I have had the benefit of discussing recently many of the matters raised in this letter with the other homeowners of seven houses of the Trinity Mews Development. I believe the position stated accurately reflects the cumulative views of the residents, subject of course to any contrary opinions they may themselves put forward as part of this process.</p> <p>The presence of the Trinity Mews Development and the views of the homeowners should be properly taken into account when formulating any revisions to the Site use. Residents presently benefit from an abundance of natural light, views over the playing field and/or over low-level brewery buildings permitting sight of the riverside trees and beyond and relative tranquillity. The proposed development, if insensitively pursued, could blight the lives of the residents and negatively impact real estate values both during the construction phase and years to come. Particular regard should be had to the matters specified under 'Amenity' in section 5.12 of the 2011 Brief.</p> <p>In making the representations set out in this letter, I have reviewed the following documents:</p> <p>(a) "Supplementary Planning Document Stag Brewery, Mortlake, SW14 Planning Brief Adopted July 2011" (the <b>2011 APB</b>) – found at <a href="http://www.richmond.gov.uk/stag_brewery_2010-2.pdf">http://www.richmond.gov.uk/stag_brewery_2010-2.pdf</a> - which was formulated on the back of a public consultation;</p> <p>(b) "Stag Brewery, Mortlake, SW14 Planning Brief Supplementary Planning Document" (undated) (the <b>2011 Brief</b>) – found at <a href="http://www.richmond.gov.uk/5314_document_final_rev5.pdf">http://www.richmond.gov.uk/5314_document_final_rev5.pdf</a> – incorporating an Indicative Land Use Plan;</p> <p>(c) Appendix 1, dated December 2011:- found at <a href="http://www.richmond.gov.uk/stag_brewery_2010_maps_opt.pdf">http://www.richmond.gov.uk/stag_brewery_2010_maps_opt.pdf</a>. the plan on page 26 ('Council's vision') is referred to in this letter as the <b>2011 Indicative Plan</b>; and</p> <p>(d) a document entitled 'The purpose of the consultation' (undated) – found at <a href="http://www.richmond.gov.uk/stag_brewery.pdf">http://www.richmond.gov.uk/stag_brewery.pdf</a> (the <b>Consultation Solicitation Document</b>).</p>

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		<p>I am also familiar with the local development plans formulated since the date of these documents, all of which endorsed the conclusions from the earlier documents; indeed, as regards the Stag Brewery site, the Local Village Plans cross-refers in most places to the outcome of the recent consultation, in view of the Adopted Planning Brief which was in place. This includes the Supplementary Planning Document entitled 'Mortlake Village Planning Guidance' dated September 2015 and approved in January 2016 – found at <a href="http://cabnet.richmond.gov.uk/documents/s59326/Appendix%201%20-%20Mortlake%20draft%20Village%20Planning%20SPD.pdf">http://cabnet.richmond.gov.uk/documents/s59326/Appendix%201%20-%20Mortlake%20draft%20Village%20Planning%20SPD.pdf</a> (the <b>Village Planning Guidance</b>).</p> <p><b>2. SECONDARY SCHOOL ON THE SITE</b></p> <p>2.1 I have become aware of recent plans to introduce – unilaterally, and without due consultation - significant changes to the 2011 APB through the medium of the School Place Planning Strategy. Those changes, providing for a six-form entry secondary school, are material in size and nature; risk entirely prejudicing the deliverability of the original 2011 APB and its objectives; and will necessarily cut across numerous other matters the Council is, in some cases legally, obligated to take into account in formulating policy, many of which are identified in Appendix 1 'Local Plan Consultation from 4 January to 1 February 2016'.</p> <p>2.2 I wrote by email to a Councillor seeking clarification on these matters three months ago; I have yet to receive a response. I also have further questions. Suffice to say, I remain to be convinced as to the legality of the decision, and the process by which it was reached. Accordingly, I reserve, <i>inter alia</i>, the right to seek judicial review of that decision. The purchaser of the Site will doubtless also take legal advice on a matter which only came to light very late on in the marketing process, and possibly after bids had been submitted.</p> <p>2.3 Against that background, I consider it prudent for the Council to proceed on the basis of dual plans: one for a primary school, which has the demonstrable support of the local community, and one for a secondary school.</p> <p><b>3. OBJECTIVE OF THE VILLAGE PLAN AND FOR THE SITE</b></p> <p>3.1 <b>2011 Brief:</b> The stated overall vision is <i>“based on the desire to provide a new village heart for Mortlake based upon buildings and open public realm of the highest quality that will radically transform Mortlake whilst respecting the character and history of the area. The site should provide a new recreational and living quarter with a mix of uses, creating vibrant links between the River and the town, and enlivening the Riverside frontage and Mortlake High Street, fully realising this unique opportunity for the Mortlake community.”</i></p> <p>3.2 I would urge the Council to keep this admirable objective, which I wholly endorse, in mind throughout the process when formulating plans and/or reviewing planning consent requests. As stated above, it is almost impossible to reconcile this stated aim with the inclusion of a secondary school on the Site.</p> <p><b>4. SITE USE</b></p> <p>4.1 <b>2011 APB:</b> the conclusions of the 2011 APB remain broadly appropriate. Per section 1.17: <i>“The conclusion from the consultation was that the lower density high quality housing schemes with community benefits including a primary school/ community hub, open space including retention of existing playfields and creation of new open space links), leisure uses such as a museum, craft centre, café and community space and boat house and small scale employment spaces was the most favoured approach.”</i></p> <p>4.2 <b>2011 Indicative Plan:</b> this plan remains mostly appropriate. However, as regards the site of the primary school/community hub, I favoured the alternative plans contained in the Consultation Solicitation Document, which put the primary school alongside the playing field. This was largely because, from a practical perspective, I simply do not see how a low-level primary school, even if single-form entry, could fit within the allocated space. Logistically, assuming the bus depot is relocated to the Site, it would also be preferable for the depot to be closer to the school, and this would allow a small staff car park to be included in the space shown for the school at the northern perimeter of the playing field.</p>

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		<p>4.3 In any event, notwithstanding my comments on the planned secondary school, if that were to replace the small primary school/community hub indicated in the plans and supported by the public, it would surely need to be moved to occupy the land presently identified as 'Residential – 6-7 story' towards the middle of the Site.</p> <p>4.4 If the site incorporates a secondary school, and not 'community use', it is important that the community hub be relocated to engender a village feel consistent with to overall objectives. This may require a smaller residential allocation.</p> <p>4.5 The retention of the playing fields remains of significant importance. Further uses could, however, be added, as this is currently limited, as far as I can tell, to Sunday morning football and the annual village fete. The viability of this would of course be subject to implementation of appropriate parking arrangements: attendees for football matches on Sundays at present park in an uncontrolled zone on Williams Lane which severely impedes use of the road by other vehicles and by pedestrians on the pavement.</p> <p>4.6 <b><u>Village Planning Guidance</u></b>: I endorse the objectives set out at section 2.3 of the Village Planning Guidance adopted in January of this year. I note the reference to a school (of any kind) has been omitted.</p> <p><b>5. APPEARANCE OF DEVELOPMENT</b></p> <p>5.1 <b><u>2011 APB</u></b>: the conclusions of the 2011 APB remain broadly appropriate. Per section 2.37: Key issues will include: “<i>The visual relationship of the site to the surrounding area, including views up and down stream and across the River Thames, together with key views towards and into the site; the existing urban grain and scale (Appendix 1, Plan 7); the opportunity to significantly enhance the character and appearance of the area through high quality development; permeability and specifically, the opportunity to visually and functionally link the site with surrounding areas and with the substantial riverside frontage; the incorporation of the principles of sustainable design and construction.</i>”.</p> <p>5.2 And section 5.30: “<i>Well-proportioned and sensitive architecture is required</i>”.</p> <p>5.3 Per section 5.26: the three heritage buildings and boundaries should be protected.</p> <p>5.4 <b><u>Trinity Mews Development</u></b>: any new development adjacent to the Trinity Mews Development should be sympathetic to the housing style found there and throughout Richmond Borough. Further detail on this style is contained in the Village Planning Guidance (Area 6).</p> <p><b>6. HEIGHT OF THE DEVELOPMENT</b></p> <p>6.1 <b><u>DM CC 3 Taller Buildings</u></b>: Per 'Local evidence and need', the London Plan policy 7.7 concluded that Mortlake is an area where taller buildings will be inappropriate in general. This supports evidence presented in 2008 (referenced at 5.30 of the 2011 APB): “<i>buildings are typically two to three storeys with the exception of the Mortlake Brewery Granary building which stands as a local landmark at eight storeys</i>”.</p> <p>6.2 <b><u>APB 2011</u></b>: the conclusions of the 2011 APB remain broadly appropriate.</p> <p>6.3 Per section 5.31: “<i>If taller buildings are necessary to ensure a viable scheme higher building could be located at the core of the site, generally where the larger and higher existing buildings are located, and that height and scale diminish towards the perimeter of the site or along the Riverside.</i>”</p> <p>6.4 And per section 2.38: “<i>This view was further confirmed at a Public Meeting on 9th December 2010 where potential heights of development ... were again raised as issues, and where the majority voted significantly against any large scale destination uses.</i>”</p> <p>6.5 <b><u>Indicative Plan and Consultation Solicitation Document</u></b>: these plans show the maximum heights that would generally be acceptable on the site in view of the planning developments being sought.</p> <p>6.6 Consequently:</p> <p>(a) any new development should be fundamentally low-rise, with the exception of certain existing buildings which may (in-keeping with their present appearance), in places, rise to 6-8 stories;</p> <p>(b) the perimeters – including outside the Trinity Mews Development - and the river frontage – should be especially low-rise</p>

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		<p>(maximum 2-3 stories) and must afford existing residences their right to light; and  (c) in any event, the proposed development must not at any point exceed the height of buildings already on that footprint.</p> <p><b>7. RESIDENTIAL</b></p> <p>7.1 <b>APB 2011:</b> the low-to-medium density residential scheme advocated by the APB 2011, the 2011 Brief and the 2011 Indicative Plan remains appropriate. This envisaged, in line with the Consultation Solicitation Document, that no more than 390 dwellings should be supported on the site, with low density housing (40-50 dph) to the north of the playing field. Any increase in that number would result in a failure to satisfy the competing objectives of the site, and the overall objective: to create a sustainable, new village heart for Mortlake.</p> <p>.2 Housing on the north western zone (i.e. beside the Trinity Mews Development) “<i>should be lower density with heights of up to 3 storeys relating to existing residential ... and create a new street emulating the character of buildings of townscape merit on the Lower Richmond Road.</i>”</p> <p>7.3 No more than 40% should be allocated to affordable housing, consistent with what has been achieved in comparable developments in neighbouring Boroughs. Of that, most should be made available to key workers.</p> <p>7.4 Per section 5.2 of the 2011 APB, all homes should meet at least Code level 4 of the HCA Code for Sustainable Homes.</p> <p><b>8. TRANSPORT AND ACCESS</b></p> <p>8.1 <b>APB 2011:</b> the conclusions of the 2011 APB remain broadly appropriate: Per sections 2.39 to 2.41. “<i>The site has a PTAL rating of 2. The relationship and proximity of the site to the railway will be a key consideration and the potential for enhancing linkages should be explored as part of any proposal. In addition, the site sits on several bus routes and opportunities should be explored for the integration of the site with the bus network and for new and improved services. The existing bus stop near Bulls Alley gives good access to the Eastern section of the site. Opportunities to link with existing or possible future river transport routes and leisure uses will be actively encouraged.</i>”</p> <p>8.2 As such:</p> <p>(a) transport provision must be adequately addressed at planning stage – if it cannot be accommodated, the plans must be revised;</p> <p>(b) this should include the relocation of the Mortlake bus terminus to the site, or potentially to the under-utilised land next to Chalkers Corner on the Lower Richmond Road;</p> <p>(c) representations must be made to TfL, Network Rail and South West Trains to increase the provision of rush-hour services to Mortlake Railway Station, which is already substantially over-utilised and merits additional, and fast/semi-fast, services to London Waterloo, with additional 10-car carriages (see NPPF, paras 29, 32, 35, 38);</p> <p>(d) there is presently zero capacity on rush-hour trains: it is impossible to see how the present infrastructure could support a secondary school, less still when coupled with c.390 new dwellings and the c. 140 jobs the Council needs to seek to encourage to the site to replace jobs lost on ABInbev’s divestment;</p> <p>(e) extension of riverboat services to the City, or at least Putney to connect with services there, should be seriously considered as a means of alleviating pressure on the railway network and would be consistent with the other strategies which seek to optimize the use of the River;</p> <p>(f) the site should allow for ample roadways and paths: Williams Lane is already insufficient for the volume of traffic it now carries following construction of the Trinity Mews Development and lacks road markings and a proper pavement;</p> <p>(g) any redevelopment must realistically assess the increased volume of traffic, in what is already, along the Lower Richmond Road in particular, an over-used stretch of road;</p> <p>(h) pathways allowing access across the site to the River Thames, to the focal point of the new village and to Mortlake Railway</p>

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		<p>Station (as well as any new bus terminus) should be incorporated;</p> <p>(i) the Consultation Solicitation Document referenced potential removal of the path beside Ship Lane: note that one resident already appears to have blocked off part of that passageway, one imagines to use as part of their property; and</p> <p>(j) a controlled parking scheme on Williams Lane and environs benefitting residents of the Trinity Mews Development will be required.</p>
40.	Diana Collins	<p>Please consider these points with reference to the Local Plan review:-</p> <p>There should be more opposition to changing offices to residential use and more protection for small businesses.</p> <p>Where permission is granted for residential use, particularly within large developments, provision must be made for schools either within the site or on a <u>suitable</u> alternative site.</p> <p>In December 2014, the Environmental Audit Select Committee of the House of Commons recommended no hospitals, care homes or educational establishments should be located near pollution "hotspots". In Richmond, there are several locations, in particular the A316 Lower Mortlake Road where the average amount of NO2 regularly exceeds the Air Quality objective - figures are readily available on the website of <a href="http://lovecleanair.org">lovecleanair.org</a>. There appears to be no improvement of these levels in recent years and there is a need to protect the most vulnerable in our community - in particular young children and the elderly.</p>
41.	Rebecca Bilfinger, GVA obo Lady Eleanor Holles School	<p>We write on behalf of the Lady Eleanor Holles School (LEHS) regarding the consultation LB Richmond is currently undertaking in preparation for the new Local Plan.</p> <p>GVA previously submitted representations, on behalf of LEHS, to the pre-publication consultation on the Site Allocations DPD. The representations proposed the allocation of the school for education use and an amendment to the Metropolitan Open Land (MOL) boundary in order to establish a positive policy position to support the expansion of the school.</p> <p>We understand that this consultation is limited to the scope and rationale of the planning policy review, but find that the proposed scope of review for the following planning policies does not go far enough:</p> <p>CP18 (Education and Training)</p> <p>We recommend that LB Richmond's proposed update to the policy (to 'more accurately reflect local needs') addresses the need for places at independent schools, as well as state-funded schools. The current evidence base considers only state schools and does not take account of the contribution made by schools such as LEHS. Policy CP18 should be revised to plan positively for <i>all</i> school places, including independent schools.</p> <p>DM OS 2 (Metropolitan Open Land)</p> <p>In the context of increasing pressure on school places, and the policy support (at all levels) for the provision of education facilities, we recommend a revision to Policy DM OS2 to include an exception clause for education uses (where it can be demonstrated that there is a clear need for development). In addition, we recommend that the Council review the MOL boundary at Lady Eleanor Holles School.</p> <p>We explore each of these policies in detail below:</p> <p><b>1. CP18 (Education and Training)</b></p> <p>Evidence of education need :</p> <p>The shortage of school places in London is well documented; the supporting text of London Plan Policy 3.18 states that London's population is younger than other places in England and Wales, and that by 2036 the London school age population is projected to increase by 18% (paragraph 3.102). According to the Independent Schools Council, over 7% of the total number of school children in England are educated in the independent sector.</p> <p>The GLA's 'Projected Demand for School Places' report (November 2015) shows that, for London as a whole, demand for state-funded primary school places is projected to increase by 60,000 pupils (8.8%) over the decade to 2024/25, and demand for</p>

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		<p>independent primary school places is projected to increase by 10,000 (9.1%) by 2019/20 (if the proportion of children attending state and independent schools remains constant). For secondary school places, the report shows that demand for state-funded places is projected to increase by 105,000 pupils (26.5%) over the decade to 2024/25, and demand for independent school places is projected to rise by 18,000 (24%) by 2024/25.</p> <p>The data from the GLA report also shows net cross border flows for independent primary and secondary schools for 2014/15. For Hampton North Ward (of which Lady Eleanor Holles School is a part), there was a net inflow of both primary and secondary school pupils into the Ward. Schools in Hampton North Ward are therefore catering for demand at both a local and a more strategic level.</p> <p><b>Planning Policy</b></p> <p>In a context of increasing pressure on state-funded and independent school places in London, the NPPF states that ‘the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities’ (paragraph 72). The NPPF (paragraph 72) encourages local planning authorities to ‘take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education’.</p> <p>The NPPF position is reflected in London Plan Policy 3.18, which states that LDFs should provide the framework to ‘secure sites for future provision recognising local needs and the particular requirements of the education sector’. In addition, the supporting text of the policy explains that national education policy favours greater diversity in the nature of supply, through greater devolution of responsibilities from local authorities to schools.</p> <p>The existing local planning policy reflects the requirements set out in the NPPF and London Plan. Core Strategy Policy CP18 recognises that demand for primary places is particularly high in Richmond, and states that ‘the Council will ensure that the provision of schools, pre-schools and other education and training facilities are sufficient in quality and quantity to meet the needs of residents’. In addition, the policy notes that ‘the potential of existing educational sites will be maximised through redevelopment, refurbishment or re-use to meet educational need.’</p> <p>In a context of increasing need for school places, planning policies relating to education facilities at the national, strategic and local level are explicitly pro-development and do not distinguish between state-funded and independent schools.</p> <p><u>Evidence of need at LEHS</u></p> <p>Evidence from the School’s own surveys, compiled by Ratcliffe Hall (an established consultancy in the independent education sector), demonstrates a clear need for the expansion of education facilities. According to the report, the female population in the LEHS catchment area (which includes Richmond on Thames, Kingston on Thames, Hounslow, Runnymede, Emlbridge and Spelthorne) will rapidly increase between 2016/17 and 2026 for age groups 5-19.</p> <p><i>See the Appendix (2) to this document for the Population projection graph.</i></p> <p>The evidence also shows that a number of nearby independent schools are full and currently run a waiting list. In recent years, LEHS has had capacity to admit only a third of pupils that apply to the senior school (year seven).</p> <p>In accordance with the approach encouraged in paragraph 72 of the NPPF, the Governors at Lady Eleanor Holles School would welcome the opportunity to work collaboratively with the Local Authority, to discuss their plans to expand the school and, by catering for some of the need for independent school places, to potentially relieve some of the pressure on education facilities in the borough.</p> <p><b>Recommendation for scope of policy review</b></p> <p>As mentioned above, London Plan Policy 3.18 requires that LDFs provide the framework to ‘secure sites for future provision recognising local needs and the particular requirements of the education sector’. Indeed, local authorities have a duty under Section 13A of the Education Act 1996 (as amended by the Educations and Inspections Act 2006) to ensure fair access to educational opportunity.</p>

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		<p>We welcome the Council's proposal to update Policy CP18 so that it more accurately reflects local needs. But, in light of evidence that need is projected to increase for both state-funded <i>and</i> independent school places, we recommend that LB Richmond's assessment of local need should address the increasing need for both state-funded <i>and</i> independent school places. Further, the supporting text of London Plan Policy 3.18 explains that national education policy favours greater diversity in the nature of supply. In support of diversity in the nature of supply, and in the interests of 'development that will widen choice in education', LB Richmond's review of Policy CP18 must address need arising from independent schools, as well as that arising from state-funded schools.</p> <p><b>2. DM OS2 (Metropolitan Open Land)</b>  Planning Policy</p> <p>In accordance with London Plan Policy 7.17, Metropolitan Open Land is afforded the same level of protection as Green Belt. Paragraph 80 of the NPPF identifies the Green Belt as serving the following purposes:</p> <ul style="list-style-type: none"> <li>• To check unrestricted sprawl of large built up areas;</li> <li>• To prevent neighbouring towns merging into one another;</li> <li>• To assist in safeguarding the countryside from encroachment;</li> <li>• To preserve the setting and special character of historic towns; and</li> <li>• To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ul> <p>The Metropolitan Open Land (MOL) designation is established in the London Plan. Policy 7.17 allows only 'appropriate development' that is limited to small scale structures to support open uses, and which minimises adverse impacts on the openness of the MOL. In order to be designated as MOL, land must meet one of the following criteria:</p> <ul style="list-style-type: none"> <li>• It contributes to the physical structure of London by being clearly distinguishable from the built up area;</li> <li>• It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;</li> <li>• It contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value; and</li> <li>• It forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.</li> </ul> <p>Current local policy on Metropolitan Open Land is set by policy DM OS2 of the Development Management Plan (2011), and the existing MOL designation is shown on the Core Strategy Proposals Map (attached to this letter). The policy states that the borough's Metropolitan Open Land will be protected and retained in predominantly open use. The policy lists appropriate uses in MOL but recognises that there may be exceptional circumstances where appropriate development, such as small structures, is acceptable-but only if it does not harm the character and openness of the MOL and is linked to the functional use of the MOL or is for essential utility infrastructure.</p> <p><b>Strategic policy conflict</b></p> <p>The protectionist policies described above should be considered in the context of the pro-development policies relating to education facilities. There is strong policy support at national, strategic and local level for the expansion of existing education facilities, in a context of increasing pressure on school places and the legal obligation for local authorities to ensure fair access to educational opportunity.</p> <p>Despite the clear policy support for the expansion of education facilities, the development of many school sites in LB Richmond (and much of London) is constrained by the MOL designation. This strategic policy conflict, between education provision and Metropolitan Open Land, presents a significant obstacle in the local authority's ability to implement planning policies relating to education provision.</p>

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		<p><b>Recommendation for scope of policy review</b></p> <p>We note that the Council do not propose to review the Metropolitan Open Land (MOL) boundaries as part of the new Local Plan, with the exception of the MOL boundary at Harrodian School in Barnes. However, in light of the strong policy support for education provision, and the strategic policy conflict between DM OS2 (MOL) and CP18 (Education), we recommend that a focused review is undertaken of the boundary at LEHS. We suggest that, where a clear need can be demonstrated, alternative sites are deemed inappropriate for development, and the land designated as MOL does not serve its purpose, there is a planning case to justify the release of that part of the MOL designation for education-related development. There is strong policy support for the expansion of education facilities, and an established need for the development of education facilities at LEHS. Further, the quantity of land we propose for exclusion from the MOL designation at LEHS makes a minimal contribution to MOL. The proposed amendment to the existing MOL designation at LEHS is shown on the Proposed Amended MOL Designation Plan, attached to this letter. The amendment concerns a piece of land towards the south east corner of the school site, near Hanworth Road. Its development for education purposes would not have an adverse impact on the openness of the MOL and, in addition, would positively contribute to the objectives of Policy CP18. The release of the land from the MOL designation for education purposes would not have a significant adverse impact on the openness of the MOL and would positively contribute to the objectives of Policy CP18, going some way to help reconcile the strategic policy conflict that exists between CP18 and DM OS2. Whilst our preference is for the removal of this land from the MOL designation, we would also recommend the addition of a clause to Policy DM OS2 to allow an exception for education uses where it can be demonstrated that a need for the expansion of education facilities exists, and there is no conflict with the openness of the MOL. For example: 'Where need can be demonstrated for the expansion of an education facility, and there is no reasonable alternative location for that facility, the development proposal will be treated as very special circumstances'.</p> <p><b>Conclusion</b></p> <p>In a context of increasing pressure on school places, and strong policy support for the development of education facilities (that does not distinguish between state-funded and independent school places, but favours greater diversity in the nature of supply), we recommend that the Council's assessment of local need should address the increasing need for both state-funded <i>and</i> independent school places. Policy CP18 should be revised to plan positively for <i>all</i> school places, including independent schools. Since the majority of the Lady Eleanor Holles School site is designated as MOL, and therefore subject to the protectionist policies referred to above, there is a strategic policy conflict between the pro-development policies relating to education facilities, and the protection of MOL.</p> <p>We recommend that this policy conflict be reconciled either by reviewing the MOL boundary at Lady Eleanor Holles School, or by adding an exception clause to policy DM OS2.</p> <p>We would welcome the opportunity to continue discussions on LEHS's plans, and their proposals to accommodate further school places, through a meeting with officers. Please do not hesitate to contact Tim Sturgess or me to discuss further.</p> <p><i>See the Appendix (3, 4 and 5) to this document for the LEHS Consultation Response, including population graph), Core Strategy proposals Map, and Proposed Amended MOL Designation.</i></p>
42.	Andrew Dorrian, Transport for London Planning	<p>I write following receipt of the notification that the London Borough of Richmond has undertaken consultation on the proposed scope of the review of its planning policies. This follows a meeting held with council officers on the 18th January 2016.</p> <p><i>Please note that these comments represent an officer level view from Transport for London 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. These comments also do not necessarily represent the views of the Greater London Authority, which has been consulted separately. The comments are made from TfL's role as a transport operator and highway authority in the area and do not necessarily represent the views of TfL's commercial property team who may respond separately.</i></p>

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		<p>The GLA letter makes reference to the need to have regard to TfL's specific comments in respect of transport and infrastructure</p> <p><b>General comments</b></p> <p>TfL welcome the early opportunity to comment on the review of planning policies and emerging site allocations. As is usual, TfL (Borough Planning) requests that it be consulted directly on all planning applications referable to the GLA (under the Mayor of London Order 2008). TfL also requests that it be consulted on applications which are located on the Transport for London Road Network (TLRN) or where they are within or adjacent to TfL infrastructure, for example bus or rail/ Underground networks. This is to ensure that development is acceptable in strategic transport terms and impacts are appropriately mitigated in line with London Plan policy. To support this process applicants are advised to refer to TfL's Transport assessment best practice guidance and to make use of TfL's pre application advice service or to contact the Borough Planning team directly (Information is available on TfL's website): <a href="https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance">https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance</a></p> <p><b>Research and Data</b></p> <p>As noted at the meeting the findings of the 2050 Infrastructure Plan can be referred to in preparing the plan. TfL is also undertaking research around parking design and further work around accessibility to the network in relation to density levels. Outputs from this work can be forwarded to the council to assist in the preparation of the plan. TfL released its refreshed Streetscape Guidance in December 2015; this should be referred to in the plan.</p> <p><b>Transport infrastructure and housing development</b></p> <p>You will be aware of the renewed emphasis being placed on the relationship between transport infrastructure and housing development. The Housing and Planning Bill and changes to the NPPF, as well as the creation of the National Infrastructure Commission, further endorse this relationship. TfL is keen to investigate with the council any opportunities for developing homes along transport corridors or around transport nodes.</p> <p>As part of this process it will be important to establish funding mechanisms to capture land value to help pay for future infrastructure funding, either through conventional s106 and CIL or other means.</p> <p><b>Crossrail 2</b></p> <p>TfL has recently concluded a consultation exercise into route options and feedback for Crossrail 2. This exercise included 4 stations within LB Richmond, (Hampton Wick, Teddington, Fullwell, and Hampton). These stations are located on the proposed spur from New Malden to Shepperton. In making the case for Crossrail 2, it is important to demonstrate the additional housing and economic development opportunities that could be realised as a result of investment in the scheme. It is therefore important that the transport benefits of Crossrail 2 and any associated development opportunities are identified early and acknowledged within emerging local planning frameworks.</p> <p>As the council will be investigating housing numbers and site allocations more generally, TfL is keen to explore sites within a 1km radius of these four stations to capture the growth potential that scheme could deliver, through increased density, intensification, land use changes or over station development. TfL has undertaken an initial study and would be please to share the results with the council to help inform further exploration through the development of this plan, as well as shaping the London Plan and MTS. Further TfL is keen to explore support through the council's policies for the project.</p> <p><b>A316 Highway Study</b></p> <p>TfL is currently exploring corridor improvements for the A316 between Chaulkers Corner and Hospital Bridge Road. A corridor plan is being devised which explores the top priorities for improvements, building on current and planned schemes as well as future potential schemes. As within our analysis of growth areas, many sites along the A316 will significantly benefit from these improvements. This study and its improvements should be referred to in the plan and it is expected that developments along the A316 contribute appropriately, (financially and in their design) towards the delivery of agreed projects.</p>

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		<p><b>Metropolitan Open Land (MOL)</b> The release of MOL in special circumstances is recognised for example in cases of school expansion. TfL request that the transport impacts of onward development are considered at the outset, to ensure sustainable transport options are available, together with mitigation on existing modes.</p> <p><b>Riverside Wharves</b> TfL support the proposal to strengthen protection to wharves which is consistent with London Plan policy 7.26. LB Richmond is recommended to consider the Thames Strategy for the area when defining the policies as noted by London Plan policy 7.29 and the rationale for review as per policy DM OS 11.</p> <p><b>Transport policies.</b> The proposed approach to reviewing the transport policies is extremely positive with the main focus on the high trip generating uses being located in the most accessible locations. More detailed comments on some of the proposed policy changes are provided below.</p> <p><i>DMTP2 – Transport and New Development:</i> It is agreed that detailed standards for Travel Plans, Construction Logistics Plans and Delivery and Servicing Plans could be included in a Supplementary Planning Document. A reference should remain with the Local Plan DM policy. TfL would be keen to explore the SPD wording with the council, in relation to existing TfL guidance to make it effective.</p> <p><i>DMTP5 – Taxis and Private Hire Vehicles:</i> The council proposes to remove this policy and integrate it into strategic policies. In principle, TfL has no objection to this proposal. The redrafted policy should ensure that taxis and private hire vehicles are adequately catered for in appropriate locations (e.g. stations, town centres and hotels). The TfL Ranks Action Plan (2015) should be referred to when planning for taxi provision.</p> <p><i>CP5 Sustainable Travel and 5B Land for Transport:</i> TfL welcome the council's proposal to signpost regional infrastructure projects within the implementation section or Infrastructure Delivery Plan (IDP). Signposting regional infrastructure project, identified through the South Sub regional Transport Plan process will be important, together with delivery methods. TfL understands the council's view on striking the right balance in order to make the plan future proof and would be interested in exploring wording matter further with the council. A delivery matrix grouping projects into temporal periods, such as table 6.1 of the London Plan could be effective in this regard.</p> <p>Reference to major projects such as Crossrail 2, A316 highways scheme, town centre urban realm schemes and any river crossings are recommended to be included within the IDP.</p> <p><i>DMTP 3 Enhancing Transport Links, CP5: Sustainable Travel, 5C Cycling and Walking:</i> TfL supports the enhancement of local cycling and walking routes including the delivery of new river walkways and new bridges across the Thames. These projects should be developed in consultation with stakeholders. The proposal to consolidate Cycling and Walking policies into CP5 is supported. The latest cycle parking standards from the London Plan (2015) should be reflected in the policy.</p> <p><i>DMTP 6, Walking and the Pedestrian Environment:</i> When reviewing policy DMTP6, Walking, the council should refer to the latest Streetscape Guidance and introduce the promotion of Legible London, ensuring consistency with London Plan policy 6.10.</p> <p><i>CP5 Sustainable Travel and CP5.F Car parking:</i> TfL support the council's proposal for car free schemes. All standards should take account of latest London Plan standards to strike an appropriate balance. An approach to setting standards should be based on accessibility and dependency on the car as identified in the intention to publish version of the Minor Alterations to the London Plan - MALP (December 2015). TfL would be happy to explore this matter further with the council.</p> <p><i>DMTP9 Forecourt Parking:</i> TfL has guidance around parking space design for spaces where they are proposed to be accessed from the TLRN. This guidance has been circulated to the council for their review.</p>

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		<p><b>Site Allocations</b>  TfL Borough Planning provides the following comments on the proposed site allocations,  <b>TW 8 Harlequins Rugby, Langhorn Way, Twickenham</b>  TfL recognises that changes may be required to the A316 Chertsey Road (TLRN). Any changes to or additional signalised junctions onto the A316 must be fully justified having regard to operation of the wider network so as to ensure general conformity with London plan policy 6.11. The A316 study as referenced above would be applicable to this project.  <b>TW 14 Rugby Football Union, Whitton Road, Twickenham</b>  TfL will work closely with the applicant and council on the development of the stadium and any ancillary uses. The A316 study is applicable for any future development at the site, together with, servicing facilities and a visitor management plan.  <b>RI 2 Richmond Station and above track, Richmond</b>  TfL welcomes the desire to improve the station and requests consultation on the detailed proposals due to the incidence of both London Overground and London Underground services operating from this station.  <b>Conclusion</b>  Overall, TfL is supportive of the approach to this revision of the local plan which is in general conformity with London Plan policies. Further discussions are requested with the council around growth scenarios for Crossrail 2, wording around future infrastructure projects and details around a separate SPD to incorporate transport standards.  <i>See the Appendix (6) to this document for TfL's Vehicle Cross over guidance</i></p>
43.	Alice Shackleton	<p>1. I adopt the responses of Ms Andree Frieze sent to you today. Please take them as included in my responses.  2. In addition and more particularly, I would want the Local Plan to have as objective:  That no school, home for the elderly, hospital or other similar institution be permitted on a site that exceeds the Air Quality Objective. That would accord with the strategies and objectives of the Local Plan.  This applies, in particular, to sites along the Lower Mortlake Road between Manor Circus and Richmond Circus, which consistently exceed the threshold in the Air Quality Objective (see Richmond Council's graph reported December 2015 attached, as example, together with the Figure 19 setting out the graph for other sites in the Borough, which I have not attached).  <i>See the Appendix (7) to this document for Nitrogen Dioxide graph 2011</i></p>
44.	Rebecca Pullinger, Campaign to Protect Rural England (CPRE)	<p>CPRE London is the London branch of the Campaign to Protect Rural England. We are a membership based charity concerned with the protection and enhancement of London's Green Belt, Metropolitan Open Land and urban open and green spaces. We have over 2,700 members across London. Thank you for this opportunity to comment at this early stage of the Local Plan review.  <b>Metropolitan Open Land</b>  • We are concerned that <b>Appendix 1</b> text on the Metropolitan Open Land Policy states that current policy "allows for flexibility or exceptions where required for example in the case of school expansion proposals on MOL." This is not the case: Richmond's current Local Plan states that development on MOL is only allowable in 'very special circumstances' and the criteria listed (Annex 1) do not exempt school expansions from this. It is our understanding that general pressures such as the need for school expansion do not constitute the very special circumstance required to justify development on Metropolitan Open Land. In our view this text should be removed to ensure it is consistent with national and London policy which does not support exceptions based on generalised pressures.  <b>Policies</b>  • <b>We support the introduction of a Green Infrastructure policy.</b> This will help connect a range of current Local Plan policies which will lead to the better protection of Richmond's multi-functional networks of open spaces and green corridors as well as the potential for sustainable travel plans for example.</p>

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		<p><b>• We support the protection and enhancement of the sports grounds and other open spaces across the Borough Site Allocations</b></p> <ul style="list-style-type: none"> <li>• We object to the inclusion of the playing fields in the redevelopment proposals for <b>Richmond upon Thames College</b> unless provisions ensure their enhancement for educational and community use</li> <li>• Any proposals for <b>St Mary's University College</b> will need to ensure that they include provisions to ensure that there are no negative impacts on the protected Historic Park and Garden and Metropolitan Open Land.</li> <li>• We support any proposals at the <b>Kew Biothane Plant site</b> that incorporate the provision of high quality public open space and the improvement of the character and openness of the part of the site which is designated as Metropolitan Open Land. The Local Plan should state explicitly that the current extent of the protected open space must be maintained through any proposed planning applications.</li> </ul>
45.	Ron McEwen	<p><b>Noise pollution</b></p> <p>There have been proposals to build over railway stations in the borough. There should be a provision that none of the building work should be done at night. Residents near stations already suffer a substantial amount of sleep disturbance from night work on tracks and platforms carried out by Network Rail. Any more would be intolerable. Sleep deprivation causes serious mental and physical damage and makes people more prone to accidents. There is a viable alternative: platform closures and replacement bus services, which are a minor inconvenience compared with health damage.</p> <p>Contractors who were to do work at night could face legal challenges from three angles:</p> <ul style="list-style-type: none"> <li>• Environmental Health legislation.</li> <li>• Health &amp; Safety at Work Act: "It shall be the duty of every employer to conduct his undertaking in such a way as to ensure, so far as is reasonably practicable, that persons not in his employment who may be affected thereby are not thereby exposed to risks to their health or safety".</li> <li>• Human Rights Act: "Right to peaceful enjoyment of property".</li> </ul>
46.	Kathleen Massey	<p>I write in support of the OOLTI designation of St. Michael's Convent Ham Common.</p> <p>I note that one of the criteria of OOLTI designation is that any development 'does not harm the character and openness of the open land.'</p> <p>The Convent enhances the overall character of the Ham Common area. It is an historic building, one of several of character around Ham Common that define the area and make it so special. I welcome and fully support the OOLTI designation for St. Michael's Convent as it will retain the historic boundary and the setting of the Listed Building.</p> <p>In terms of the openness of the open land, the convent lies in the Great South Avenue of Ham House, a 'green corridor' connecting Richmond Park and Ham Common, which locals enjoy and have worked hard to retain and maintain.</p> <p>The convent garden is a beautiful mix of mature trees, plants and vegetation. It is a traditional, peaceful English garden, the like of which is rare in an urban landscape. It is a delight much enjoyed by all who visit, eg on the Convent's Open Garden days.</p> <p>Those living around the Convent enjoy the openness of the space as well as the biodiversity that exists in the area. These must be preserved, because if lost from the area through over-development, they will never be returned and the special beauty and of this part of Ham Common will be permanently diminished.</p> <p>I therefore strongly support the OOLTI designation,</p>
47.	Paul Massey	<p>I write in support of the OOLTI designation of St. Michael's Convent Ham Common.</p> <p>St. Michael's Convent is one of those properties which are delightful to have in your area. Many other places in London would welcome it, as a property to value and enjoy.</p> <p>We in Ham are lucky to have it and should protect it at all costs: its size, character and location on the famous Ham Common</p>

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		<p>provide a magnificent backdrop to the area.</p> <p>The gardens in particular provide the local people with an open area of peace and tranquillity (enormously valued in this busy and over populated world). Furthermore, as a result of the way the gardens have been looked after for all these years, providing a haven for wildlife and conservation, they should be enjoyed and preserved for future generations</p> <p>In our over-populated world, we in Ham suffer from a restricted road infrastructure as we live in the bend of the Thames. We therefore suffer from high traffic congestion particularly in the “rush hours” affecting travel times and pollution. We must therefore strive to minimise additional traffic in this area by ensuring no new schools or public amenities which encourage additional vehicles are built here.</p> <p>I therefore fully support the OOLTI designation.</p>
48.	Lizabeth Rohovit	<p>I am writing to let you know that my husband, Frank Siebert (who’s copied into this email) and I feel very strongly that we would like the Convent Gardens Preserved, as much as possible. We do our best to keep informed, but it is tricky as we have four children and we work.</p> <p>Please know that we would very much like the gardens to have the designation, at minimum, of ‘other open land of Townscape Importance’ in the council’s site allocation plan. We would like the trees also preserved.</p> <p>If possible, could you inform us of anything else we can do to try and keep these beautiful gardens in our local neighbourhood?</p>
49.	Neill Tughan	<p>As new residents of Martingales Close -Ham, we have just learnt of the impending development of the adjacent convent by Beechcroft. Unsurprisingly we are therefore concerned about how this will affect our immediate neighbourhood and wish to take this opportunity of voicing our concern for the welfare and preservation of the gardens which in our opinion should be designated OOLTI.</p>
50.	RPS Planning and development on behalf of S. Oxley	<p>In making these representations, I have had regard to the following documents:</p> <ul style="list-style-type: none"> <li>- Consultation on the scope and rational for review for planning policies, together with the emerging site allocations (including Appendix 1)</li> <li>- London Borough of Richmond upon Thames Open Space Assessment Report April 2015 2015.</li> <li>- Open Land Review 2006</li> <li>- London Borough of Richmond upon Thames Infrastructure Delivery Plan 2012</li> <li>- Annual Monitoring Report 2013/2014.</li> </ul> <p>RPS has been advising Mr. Oxley on planning matters in relation to 32 Clare Lawn Avenue, East Sheen (“the site”) since 2010 when he purchased the property. RPS previously submitted representations on the Pre-publication Site Allocations Plan on behalf of Mr Oxley.</p> <p>The site (as shown on the accompanying Site Location Plan) is situated at the Southern edge of the built up area of East Sheen, immediately adjacent to the northern end of Richmond Park, 2.7km to the east of Richmond Town Centre.</p> <p>The site has an area of approximately 1.05ha and is accessed via a narrow drive from the south of Clare Lawn Avenue. The site is adjoined by medium to low density residential properties fronting Clare Lawn Avenue and Parkgate Gardens. Given its residential use, the site shares the suburban character and appearance of these adjoining properties, as opposed to the wide open spaces of the Park to the south. The site is allocated in the current Development Plan as Metropolitan Open Land (MOL).</p> <p>The review of the Borough’s planning policies and their consolidation into a single document is welcomed. By the time the Local Plan is adopted, a considerable period of time will have elapsed since the Core Strategy and the Development Management Policies were adopted and material circumstances relating to specific sites within the Borough and the development needs of the Borough’s residents will have changed. The review is therefore a timely opportunity to ensure that the Local Plan not only supports the strategic development needs of Richmond, but also plans positively to support local development.</p> <p>It is noted in paragraph 4.5.1 of the consultation report that policies relating to protecting designated open land, such as MOL are</p>

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		<p>considered to be in line with national and regional guidance. RPS does not necessarily disagree with this, but it is considered that the overall planning policy review should include a specific review of the land designated as MOL. RPS request that this review should specifically consider my client's property at 32 Clare Lawn Avenue for the reasons outlined below. Such a review is considered to be consistent with paragraph 8.3 of the National Planning Policy Framework (NPPF), which states that "Green Belt boundaries [MOL is given the same level of protection as Green Belt, as acknowledged in paragraph 4.5.3 of the consultation report] should only be altered in exceptional circumstances, through the preparation of review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>The term 'Metropolitan Open Land' was created in 1960's by the former Greater London Council (GLC), and is applied to Sir Patrick Abercrombie's Green Wedges and other areas of strategic open spaces in London. The term was introduced as part of the preparation of the Greater London Development Plan (GLDP), which post-dates the erection of the previous building at 32 Clare Lawn Avenue. Its stated purpose was to define open spaces which is often significance for Greater London as a whole. It included open land of considerable diversity ranging from Central London's Royal Parks to common land and wider undeveloped areas bordering the Green Belt. The GLC, at the time, described the MOL as land forming islands in the urban fabric or penetrating deeply into the urban fabric in the form of wedges, and was viewed as providing 'useful and attractive breaks in the built up area relieving the monotony of an otherwise continuous development.'</p> <p>The MOL concept was carried forward into Regional Planning Guidance RPG3 (Strategic Guidance for London) adopted in 1996. Paragraph 7.7 of RPG3 stated:</p> <p>"MOL has been recognised as land of predominantly open character which has more Borough significance, generally because of its size and catchment area. The main criteria for MOL designation area:</p> <ul style="list-style-type: none"> <li>• Land which contributes to the physical structure of London by being clearly distinguishable from the built up area.</li> <li>• Land which includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole of significant parts of London.</li> <li>• Land which contains features or landscape of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level.</li> </ul> <p>Paragraph 7.9 stated that "if the land does not serve a catchment area of strategic significance or draw visitors from several Boroughs, it may be more appropriate to propose and justify other local designations".</p> <p>Planning consent was granted for a large detached dwelling towards the eastern end of the site in the 1950's. Planning consent was first obtained for a replacement dwelling on the site in 1998 (98/1843 refers), and the application was renewed in 2005 (04/3158/FUL) and again in 2010 (09/0663/FUL). In 2012, planning consent was granted on appeal for the demolition of the existing dwelling and ancillary buildings and the erection of a new larger two storey dwelling has now been demolished and the new dwelling has been erected.</p> <p>Paragraph 80 of the NPPF sets out the five purposes of the Green Belt (or MOL):</p> <ul style="list-style-type: none"> <li>• To check the unrestricted sprawl of large built-up areas;</li> <li>• To prevent neighbouring towns merging into one another;</li> <li>• To assist in safeguarding the countryside from encroachment;</li> <li>• To preserve the setting and special character of historic towns; and</li> <li>• To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ul> <p>Paragraph 84 states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the</p>

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		<p>need to promote sustainable patterns of development, and should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary.</p> <p>The London Plan (March 2015) provides the strategic planning guidance for London, and contains a policy relating to MOL (Policy 7.17). This states that any alterations to the boundary of MOL should be undertaken by boroughs through the LDF process, in consultation with the Mayor and adjoining authorities. To designate land as MOL, boroughs need to establish that the land meets at least one of the following criteria:</p> <ul style="list-style-type: none"> <li>a) It contributes to the physical structure of London by being clearly distinguishable from the built up area;</li> <li>b) It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities which serve either the whole or significant parts of London;</li> <li>c) It contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value;</li> <li>d) It forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.</li> </ul> <p>Given the purposes of including land within the Green Belt, and the historic functions of MOL as set out in the GLFP and RPG3, it is curious that the appeal site was designated part of the MOL in the first place, and that the designation has survived subsequent reviews (mostly recently in 2006, before Mr Oxley purchased the property).</p> <p>The site is clearly distinct from Richmond Park to the south which acts as the check to unrestricted urban sprawl into open countryside. Because of the size of the site, its removal from the MOL will not make it more likely the existing built up area of East Sheen will sprawl further to the south and coalesce with other neighbouring urban areas. The wall along the southern boundary is a perfectly defensible boundary against such scenarios. The site does not preserve the setting and special character of an historic town, and its on-going designation as MOL would in no way because of its size, encourage the recycling of derelict or other urban land. The site in itself does not provide a clear break in the urban fabric. Indeed, it is RPS' view that the site is an integral part of the urban fabric. This particular function is instead performed by Richmond Park, which draws visitors from across London as a whole. The site in itself does not materially contribute to the green character of London. What limited contribution it does make is hardly of strategic significance, and it could be argued that much of the low density housing surrounding the site which is not MOL, makes a similar contribution. The site is in private ownership, and has been certainly since the evolution of MOL as a concept, as so serves no purpose in servicing the needs of Londoners. The site does not contain any features of landscape of national or regional significance, and does not form part of a Green Chain or link in the network of green infrastructure, which meets any of the above criteria.</p> <p>Certainly, the site does not conform to any of the criteria used to assess land for inclusion within the MOL as set out in London Plan policy 7.17. In allowing the recent appeal for a substantially larger building on the site, the Planning Inspector considered the characteristics of the site very carefully. He noted in paragraph 14 of his decision letter that: 'the site compromises a large residential curtilage within a low density suburban townscape, rather than a location with a semi-rural character.' The site is clearly an integral part of the built up area, quite distinct from the wide open space of Richmond Park, and the transition between the two is very clearly marked by the intervening boundary wall. The site is not distinguishable from the built-up area and thus fails criterion a. The site does not include any open air facilities serving whole or significant parts of London; b. the site does not contain any features or landscapes of either national or metropolitan value thus failing to meet criteria c. By not satisfying criteria a-c, the site cannot fulfil the requirement of criterion d.</p> <p>Because of the unique characteristics of the site, it is considered essential that proper consideration of these representations requires a site visit as part of the review of the extent of MOL. To this RPS would be happy to arrange a site visit and meet Planning Officers on site to discuss these issues.</p> <p>It may well be that there are other pockets of MOL where circumstances and the characteristics of individual sites have changed to</p>

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		such an extent that they no longer consistent with the purposes of being included within the MOL- This seems more than likely. Certainly none of the open spaces reviews that have been undertaken in the borough have considered the qualitative aspects of including land as MOL, and as noted above it is considered that a review of its boundaries is timely.
51.	Tim Catchpole, Mortlake with East Sheen Society	<p><b><i>Sustainable development, climate change, pollution and waste</i></b>  We would like to see a review of the definition of ‘sustainable development’. Does it include for example the creation or extension of a basement to provide a domestic cinema and/or gymnasium? We realise that this has to be addressed in the NPPF and London Plan before it can be addressed at the local level. On the other hand we have an opportunity here for the local level to influence the higher levels of Government?  We are pleased to see that the scope will now include policies on sustainable construction. We would like to see a system of compensation introduced for victimised neighbours but realise that this has to be addressed in the NPPF and London Plan first. Here again, though, we have an opportunity for the local level to influence the higher levels of Government.  We certainly support the introduction of any local policy and guidance that deals with protecting and enhancing the quality of the local environment including air quality, environmental pollution, noise and light pollution, land contamination, etc.</p> <p><b><i>Historic Environment</i></b>  We agree that policies on the historic environment should be updated to reflect the Council’s approach to village planning. In this regard our Society made comments on the East Sheen Village Plan but not on the Mortlake Village Plan (we left this to the Mortlake Community Association). However, we have recently become involved in discussions about the future of the Mortlake Brewery site and are concerned about the impact and knock-on effects that a major development here will have on the whole area of Mortlake and East Sheen. This will need to be addressed.</p> <p><b><i>Design and Character</i></b>  We agree that, in the light of new pressure for tall buildings in London, there needs to be clearer guidance on areas appropriate for, sensitive to, and inappropriate for tall buildings within the Borough. We must urge that such policies also need to apply to tall structures such as telecom masts (like the 25m high ‘monopole’ that was proposed in East Sheen last year).  With regard to basement developments (already referred to above) we are pleased to see that the Council has set up a Scrutiny Panel to investigate such developments in the Borough and we look forward to seeing their report which, we hope, will appear as soon as possible.</p> <p><b><i>Town Centres</i></b>  We agree that the Local Plan needs to look at the over-concentration of some uses such as takeaways, betting shops and estate agents in our town centres. In our East Sheen centre we certainly have an over-concentration of estate agents and this needs to be addressed.</p> <p><b><i>Natural environment, parks, open spaces, rivers and sport &amp; recreation</i></b>  Our area, which includes Palewell Common, Sheen Common and much of Richmond Park, is well provided in this regard and accordingly we have no comment.</p> <p><b><i>Transport</i></b>  We note that the Council’s response to consultations about further development at Heathrow will be informed by the Council’s policies relating to matters such as air quality and noise. We support this.  We are pleased to see a reference to ‘minimising the downtime at level crossings’. This is a major issue in Mortlake and East Sheen and will become even more so with traffic generation from the redevelopment of the Mortlake Brewery site and with any future development of a Heathrow-Waterloo express.</p> <p><b><i>Housing</i></b></p>

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		<p>We note the need for the Council to respond to the new London Plan housing target for the Borough (315 units per annum for the next 10 years) and we realise there is a major opportunity to provide housing – including an element of affordable housing – on the Mortlake Brewery site. The number of units, however, will need to be regulated in terms of the size, massing and height of the development and the traffic capacity of the Lower Richmond Road.</p> <p><b>Social infrastructure, education, health and well-being</b></p> <p>We note that the Council has identified the need for additional schools and nurseries across the borough and the pressure on health facilities brought about by the increase in housing.</p> <p>Our Society is much concerned about the increase in demand for primary school places and we are aware of the Council’s proposal to expand East Sheen Primary from an intake of 60/year to 90/year. We are also aware that the Council has identified part of the Barnes Hospital site for a new primary school but wonder if this is really necessary if East Sheen Primary is to be expanded? We do not consider the Barnes Hospital site to be suitable for a primary school due to its poor access and would argue that surplus land on the site should be used for housing, including special needs housing.</p> <p>We are also aware of the Council’s proposal to include a new 6-form secondary school on the Mortlake Brewery site in order to meet future demand but we wonder about the need for this when the Richmond upon Thames College free school opens in 2017? We are concerned that the inclusion of state nursery schools is taking custom away from nurseries currently using the church halls in our area and that church hall use may decline as a result. This needs to be addressed.</p> <p><b>Employment, business and tourism</b></p> <p>We support the Council’s policies for the protection of employment floorspace.</p> <p><b>Sites to be allocated for development</b></p> <p>Telephone Exchange, East Sheen – no comment.</p> <p>Mortlake and Barnes Delivery Office 2-12 Mortlake High Street – no comment.</p> <p>Mortlake Brewery – we note the need for a 6-form secondary school (see above) and the opportunity for the relocation here of the Avondale bus turn-around.</p> <p>Barnes Hospital, South Worple Way – we note the need for a new primary school (see above) but are much concerned about the poor accessibility of the site and would favour housing, including special needs housing, instead.</p> <p>Mortlake Station – this is shown on your Borough-wide map of development sites but there is no site description like there is for the other four sites.</p>
52.	Dale Nolan	<p>I write as a resident of Martingales Close, Ham, to comment on the importance of the site and gardens of The Convent on Ham Common and to strenuously support the designation of the site as an Other Open Land of Townscape Importance (OOLTI).</p> <p><b>Value for biodiversity and nature conservation:</b></p> <p>As you will know, the Arcadian Thames and Richmond Park are critically important areas of natural importance for London, that, with no understatement, can be described as jewels in our natural and historic heritage, items that mark out London among other of the world’s great cities as one that cares for and preserves its natural and historic sites of importance. An important part of this is the role that the River plays as a Wildlife Corridor through the built up city of London and its suburbs and how it links to other critically important sites such as Richmond Park. <b>The only Wildlife Corridor that exists between the River Thames and Richmond Park, two of the City’s greatest wildlife assets, are the Ham Avenues and Ham Common</b>, and any look at an aerial map will illustrate the <b>important of the gardens and trees of The Convent in that narrowing Corridor</b>. This is the primary route that birds and other wildlife travel through our region, and ensures that Richmond Park is not isolated by built up areas from other areas of wildlife migration and movement.</p> <p>The Thames Landscape Strategy, who recognises the role above, and who has as its patron Sir David Attenborough, describes as</p>

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		<p>an example; “The River Thames is one of the most important habitats for bats in southern England...The bats roost in the old veteran trees in nearby parks navigating their way to the river via the ‘bat super highways’ <b>such as the Ham Avenues that link the river with the open spaces.</b>” Nowhere more on this highway can you see the evidence of this in the grounds and environs of the Convent, with bats circling in evening night, stretching into Martingales Close and Ham Common. Woodpeckers and owls are commonly sighted and heard. There are many academic and local organisations that can quote the array of flora and fauna that is supported by the variety of trees, fruit and other, provided by the trees in the area. Damage to this area will vastly reduce the variety of trees and plants that serve this important Wildlife Corridor.</p> <p><b>Importance for immediate or longer views into and out of the site, including from surrounding properties:</b></p> <p>We live at 15 Martingale Close, which looks directly into the rear of the grounds of the Convent. Our front bedroom windows have a view that is solely of the trees of the Convent Gardens. We and our four children personally enjoy the views and sounds of woodpeckers and owls that live in the trees of the Gardens, with, for example, dusk adventures to observe the bats and listen to the owls in the trees. The sense of safety, privacy and calm from living in a road where one side looks onto the trees of the Convent is something we treasure daily in our lives and is always commented upon by visitors to the area. It was a critical determinant in our move to Ham from Clapham and remains so.</p> <p>Contribution to the local character by virtue of its size, position and quality:</p> <p>I have touched on Ham’s situation from a natural and historic perspective above - I feel preserving areas such as the Convent Gardens with its current essential character and contribution to Ham’s critical role as a wildlife corridor is an indication of our understanding of our village’s role in preserving this City and ensuring it is a sustainable, green and caring place to live.</p> <p>I strongly highlight the importance of the area, support it’s designation as OOLTI and urge you to refer to organisations such as the Thames Landscape Strategy, the All London Green Grid, Ham United Group and many others who can better describe the role of this type of space.</p>
53.	Tor Barrett, Nathaniel Lichfield & Partners on behalf of West London Mental Health NHS Trust	<p>On behalf of our client, the West London Mental Health NHS Trust (the Trust), we enclose representations to the London Borough of Richmond upon Thames (LBRuT) Local Plan Review consultation in relation to the proposed site allocation for Cassel Hospital, no. 1 Ham Common, Ham, TW10 7JF.</p> <p><b>Background</b></p> <p>The Trust was formed in 2001 by the merger of Ealing, Hammersmith and Fulham Mental Health Trust, and Broadmoor Hospital Authority and further enlarged by the absorption of the Hounslow Mental Health Services in 2002. The Trust is part of the National Health Service (NHS) and provides a full range of mental health services for children, adults and older people primarily living in the boroughs of Ealing, Hammersmith &amp; Fulham and Hounslow. Some services are also provided on a national basis.</p> <p>Cassel Hospital is the Trust’s only site in LBRuT. The Cassel Specialist Personality Disorder Service (CSPD) (previously known as the Emerging Severe Personality Disorder Service (ESPD)) is a national service. The CPSP occupies less than half the premises at Cassel Hospital. The remainder of the buildings are vacant and have been since 2011. The Trust has no ongoing requirement for this vacant space and can no longer sustain the financial cost of maintaining this largely empty, listed property and extensive grounds in the long term. Accordingly, the Trust is considering options for the location of the CSPD service and as such the future of the site. In anticipation of the site’s disposal, either in part or in full, has placed this asset these on the Register of Surplus Public Sector Land. Redundant parts of the building have also been marketed in accordance with its current planning designation but has only generated enquiries looking at the site as a potential residential development opportunity.</p> <p>By way of background, we have previously submitted representations on behalf of the Trust as part of the Site Allocations Plan consultation back in January 2013, the Site Allocation DPD Prepublication consultation on additional sites in July 2014 and the New Educational Sites consultation in October 2014. These representations supported the Council’s identification that suitable alternative</p>

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		<p>uses for the site would be residential and/or community use. Our most recent representations resisted the suggestion that the site should be allocated for “<i>residential (including affordable housing units) and education uses and/or community uses.</i>” The Local Plan Review consultation document (December 2015) continues to allocate the site for “<i>residential (including affordable housing units) and education uses and/or community uses,</i>” which the Trust cannot support for the reasons set out previously and further explained below.</p> <p><b>Justification of Educational Use</b></p> <p>The NPPF (2012) requires that Local Plans should be positively prepared, justified, effective and consistent with national planning policy (para. 182). The proposed allocation of the site for educational use is not in our view justified due to a lack of evidence to demonstrate the demand for educational use in this location nor is it positively prepared having regard to objectively assessed development and infrastructure requirements. We have reviewed the evidence base used to inform the allocation of educational sites, namely the LBRuT’s Education Needs Assessment (September 2013). This report identifies that in the medium-to long-term it is likely that there will be a need to consider additional provision for primary education in the Barnes/East Sheen/Mortlake; Richmond; Teddington; and Twickenham areas and that: “<i>If demand were to be exacerbated by variable factors – e.g. continuing economic difficulties altering the proportion of children whose parents opt for private schools; large ‘pupil yields’ from housing developments at Twickenham Station, the Royal Mail site, Stag Brewery, etc.; and further improvements in standards across the borough’s primary and secondary schools – then the projections of pupil numbers could be higher than anticipated.</i>”</p> <p>It goes on to state that the general approach to increasing primary school provision should include: <i>New provision on larger development sites, such as the Stag Brewery, to be provided as part of the redevelopment.</i>” In relation to secondary education, the report states that demand is not considered to exceed the identified supply. From this review, it is clear that the Ham area has not been identified as an area of demand for education facilities and accordingly there is no evidence to support the allocation of the Cassel Hospital site for primary or secondary education provision. Furthermore, the School Place Planning Strategy 2015-2024, adopted by Cabinet on 14 January 2015, identifies that within ‘school place planning area 10: Ham, Petersham and Richmond Riverside’ the three existing schools have capacity to expand with the expansion of the Meadlands Primary and The Russell Primary schools considered essential within the plan period. However, there is no established need within the report for an additional school in this area. For the reasons explained above, the Cassel Hospital site should not be identified for educational use as this is not justified or positively prepared having regard to para. 182 of the NPPF.</p> <p><b>Need for Flexibility and Compatibility of Uses</b></p> <p>Paragraph 173 of the NPPF identifies that careful attention should be paid to viability to ensure that plans are deliverable. Therefore sites should not be subject to such policy burdens that their ability to be developed viably is threatened. The Trust continues to explore options for the future of the Cassel Hospital site, including the extent to which services will remain located at the site. Indeed this is recognised in the proposed Cassel Hospital allocation in the consultation document, which states: “<i>It is acknowledged that any proposal would be subject to the hospital being declared surplus to requirements by the NHS Trust and will depend on their decision on how much of the site they need to retain for their own future needs.</i>” This recognition of the need for flexibility is supported. However the suggestion that the site could accommodate residential “<i>and educational</i>” uses is a concern to the Trust, particularly if part of the site is retained by the CSPD services.</p> <p>The CSPD service enables adults (age 18+) with severe and emerging personality disorders to access treatment. It is a very specialist assessment and rehabilitation service to support individuals who have often exhausted all other avenues of help from mental health, children’s and social care services. The safety of people using the service is paramount and the Trust works with residents to manage all aspects of risk effectively using well established systems. A school will also be tasked with ensuring the safety of its pupils. Notwithstanding the fact that there is no interest in the site from a school operator and that such a use is unlikely</p>

Ref. no.	Name / Organisation	Detailed comment
		<p>to be viable, there are concerns regarding the acceptability of a school locating next to a mental health facility. Therefore, the inclusion of “<i>and education</i>” within the proposed site allocation is a concern to the Trust as it is not considered to be an appropriate use in the event that the Trust retains the CSPD services on-site. To ensure a viable long-term future for this heritage asset it is essential that the policy is flexibly worded to ensure that a viable solution can found which helps to secure a long term future for this heritage asset.</p> <p><b>Design, Heritage and Viability Considerations</b></p> <p>A core planning policy of the NPPF includes the long-term conservation of heritage assets so that they can be enjoyed for future generations (para. 17). Paragraph 126 goes on to state that local planning authorities should sustain and enhance the significance of heritage assets and put them to viable uses consistent with their conservation. The principal planning consideration for this site is ensuring the long-term viable use of the listed building. This is recognised by the Council in the site allocation which notes a key issue as the “<i>retention and enhancement of listed buildings.</i>” Accordingly, some flexibility may be required in respect of the potential uses for the site to successfully bring forward the conversion and re-use of the building, and deliver the associated significant heritage benefits that would arise from this. To achieve this, the proposed uses should be realistic, achievable and viable in accordance with NPPF paragraph 126. We consider that education use on this site would not meet these tests either alone or in addition to residential development. Cassel Hospital was originally constructed as a residential dwelling and the surrounding area is predominantly residential in character. The conversion of the listed building to residential dwelling(s), possibly with some small/medium scale residential use in the grounds, would be an appropriate alternative use and would help to secure a long term and viable future for the building and grounds. It is considered that residential use is likely to be the only viable alternative use that would secure a long term future for this listed asset. Nonetheless, as identified above, it is recognised that some flexibility may be required in respect of proposed uses for the site, hence supporting alternative “<i>residential (and affordable housing units) and/or community uses</i>”. However, we strongly object to the insertion of the wording “<i>residential (including affordable housing units) and education...</i>” as we do not consider that this represents a viable alternative use for the site, especially where residential uses are sought in conjunction with education provision. Furthermore, to ensure that the building is appropriate and meets the relevant standards for educational use, considerable conversion works would be required including specific works to address the condition of the building and the backlog of maintenance requirements. In particular, in terms of the structural soundness of the building, it should be noted that many of the rooms in the upper floors are restricted in terms of the number of people who can actually be in some of the rooms. There are also load capacity issues in the building which will require significant investment in terms of strengthening the floor and allowing full uninhibited use.</p> <p>Consequently, it is considered that the use of the site for educational purposes is likely to be unviable. As noted in previous representations, the Trust’s commercial agent, BNP Paribas Real Estate, has advised that in its professional opinion, if the NHS finds it difficult and not cost effective to use this building, it is highly likely that other non-residential institutional users such as a school will also find it difficult to adapt this building into a financially viable use. In addition, there has been a move away from locating schools within Grade II listed buildings and instead modern, purpose-built facilities are sought to meet current day demands. This statement is strongly supported by the lack of serious or credible interest following the extensive marketing of redundant parts of the site from either a community or education provider. Overall, therefore, it is considered that there would be serious practical difficulties in delivering a school and residential development at the site whilst preserving the heritage assets and their setting as required by paragraph 126 of the NPPF. Accordingly, the wording of the site allocation is not positively prepared or sufficiently flexible to support sustainable development and the long terms protection of heritage assets.</p> <p><b>Transport and Accessibility</b></p> <p>The Cassel Hospital site has a poor PTAL rating of 2 and it was previously identified by the Council that proposed educational uses</p>

Ref. no.	Name / Organisation	Detailed comment
		<p>at the site could result in local traffic issues that would require mitigation (Sustainability Appraisal for new educational sites, July 2014). Accessibility and road safety are imperative to the development of a new school which will generate significant amounts of trips (staff, pupils, parents etc.) during the day with particular peaks in the morning and afternoon at school 'drop-off' and 'pick-up' times. The Cassel Hospital site is located in a predominantly residential area which may not have the capacity to cope with the potential volume of traffic a new school would generate. Indeed, we note that the Ham and Petersham Neighbourhood Forum submitted representations in the previous Site Allocations New Education Sites consultation reinforcing this point that the use of the site for educational purposes would detrimentally impact the existing road network at peak times. We consider this to be a significant hurdle to overcome and the Council's transport department should undertake more detailed assessments of the road network to satisfy the concern raised to ensure that such a proposed site allocation is sound and positively prepared.</p> <p><b>Conclusion</b></p> <p>In conclusion, the Trust strongly supports the allocation of the site for "residential (including affordable housing) and/or community uses". However, the inclusion of educational use within the site allocation is considered to be unjustified and unsound due to a lack of evidence base to support this allocation. In addition, the Trust objects to the inclusion of 'and education' to the allocation due to the incompatibility of education use with the CSPD service (if retained on site) and the associated impact on determining a viable use for the site; concerns in relation to the preservation of the heritage asset due to the requirement for substantial works to meet modern educational demands; and poor public transport accessibility and capacity in the local highways network. Accordingly, the Trust strongly considers that the "and education" should be removed from the wording of the proposed site allocation so that a sustainable and viable use for the site can be established in accordance with the NPPF.</p> <p>We trust that the above comments will be taken into account by the Council during the preparation of the Local Plan Review process. Should you have any questions, or require additional information, please do not hesitate to contact me or my colleague Tor Barrett.</p>
54.	Cllr Martin Elengorn obo Liberal Dem Group of Councillors	<p>Comments on behalf of the Borough's Lib Dem Group of Councillors</p> <p>It is noted that this is an extra preliminary stage of consultation and, given its nature and the absence of actual draft policies, comments inevitably cover only some of the ground. They are made without prejudice to comments that may be made at the next stage on behalf of the group or by individual councillors. Absence of comment does not necessarily indicate support for the approach envisaged though often that will be so. Can I draw to your attention that it has been normal practice to include a member of the opposition in member-level work on revised policies and that we would expect this at the next stage (my recollection is that Cllr Coombs and I were the Opposition reps in the work on what became the 2011 Local Plan and that Cllr Morris and Seymour carried out that role for the 2009 Core Strategy).</p> <p>Comments below are made by reference to Appendix I of the consultation document and, where possible by page number. However they may be more applicable to other pages or need cross-reference.</p> <ol style="list-style-type: none"> <li>1. Page 2 – CP1 - We don't favour restricting this policy to construction matters. This would, inter alia, exclude changes of use and weaken the policy</li> <li>2. Pages2/3 – DM SD 2 – the continued absence of a draft revised Climate Change Strategy is regretted and this policy needs to be consistent with it.</li> <li>3. Pages3/4 – DM SD 5 - We favour greater emphasis on green roofs and walls and greening generally</li> <li>4. Pages 5/6 – CP4 – Biodiversity policies should be strengthened with, for example, greater emphasis on green corridors/chains.</li> </ol> <p>We note that para 114 of the NPPF favours a strategic approach to these issues and this should be adopted</p> <ol style="list-style-type: none"> <li>5. Page 9 – DM DC 1 – the NPPF's guidance on design and, in particular, paras 60, 62 and 63 needs to be reflected in policies much more closely. In particular independent local design review arrangements should be reinstated, preference for so-called</li> </ol>

Ref. no.	Name / Organisation	Detailed comment
		<p>“traditional” style should not amount to an attempt to impose particular architectural styles or tastes (where appearing in policies the word “traditional” needs to be more precisely defined and justified) and innovative new design should be encouraged</p> <p>6. Page 17 – the suggested additional criterion on floodlighting should not be used to justify greater light pollution or impact on residents or harm to local biodiversity</p> <p>7. Page 17 – A more appropriate balance between access and protecting biodiversity needs to be struck on the Thames and other rivers, bearing in mind the fragility of our natural environment, the habitats on which often rare species depend and the advice of the Thames Landscape Strategy.</p> <p>8. Page 19 – DM TP 2 – A more robust approach is needed where Travel Plans are not proving effective.</p> <p>9. Page 20 – CP5 and DM TP 6 – A more focussed approach to pedestrian safety and convenience is required throughout the borough.</p> <p>10. Page 21 – CP 5 - more emphasis needed on convenient location of bus stops,</p> <p>11. Page 24 – DM HO 01 – need to quantify loss of less expensive housing through allowing larger houses to revert to single family use and consider re-introducing previous policy</p> <p>12. Pages 25/26 – CP15 and DM HO6 – need to explore all means of producing a greater proportion of affordable housing, particularly social rented – need to place greater emphasis on preference for on-site provision and making viability calculations and negotiations public.</p> <p>13. Page 28 – CP 18 – Council needs to devise strategies to identify/provide more school sites.</p> <p>14. Pages 31 and 32 – support more work on air pollution, noise and light pollution.</p>
55.	Peter Dowling, Indigo Planning Limited on behalf of Sainsbury's Supermarkets Ltd	<p><b>SAINSBURY'S, LOWER RICHMOND ROAD, RICHMOND TW9 4LT</b></p> <p>On behalf of our client, Sainsbury's Supermarkets Ltd, we write in respect of the current Local Plan Review consultation. Sainsbury's currently has a number of stores in the borough, both supermarkets and convenience stores, and is always looking at opportunities to improve and expand upon its existing offer. Moreover, Sainsbury's at times reviews its existing stores to understand the potential for maximising the sustainable and beneficial use of these sites, in accordance with the NPPF and London Plan. Given this, Sainsbury's has a keen interest in the Council's emerging policy and the implications for its existing estate and future aspirations. Having reviewed the current consultation document, we write specifically in respect of Sainsbury's existing site at Manor Road/Lower Richmond Road. A location plan of the site is included as part of this submission. We note that this site is not included as a proposed site allocation. However, the Council's own evidence base identifies it as a key site to provide housing to assist in meeting housing targets. As such, we consider that the Sainsbury's site should be allocated within the Local Plan as suitable for mixed-use redevelopment, including residential uses and the retention or re-provision of the existing Sainsbury's supermarket on site.</p> <p><b>Principle of Suitability of Site for Mixed-Use Development</b></p> <p>An undoubted emphasis of all tiers of planning policy is the provision of sustainable, mixed-use development and communities. Particularly in London, there is a strong desire to promote the maximum re-use of sites that are currently under-utilised. This is clearly evidenced through paragraph 17 of the NPPF, which states that mixed-use developments should be promoted. Furthermore, paragraph 4.15 of Planning Policy 1 February 2016 let.003.ACC.AP.20870002 the London Plan states that “The Mayor encourages mixed-use development...”. In addition, LB Richmond's own policy supports this approach. Part 1C of policy CP1 (Sustainable Development) addresses the issue of making the best use of land. It states that the use of existing and proposed new facilities should be maximised through management initiatives and redevelopment of sites should only take place where there can be an increase in the number of housing units and/or quantity of commercial floorspace. In line with this position, Sainsbury's considers that there is scope to better utilise this site. Given the overarching policy framework, we consider that there is a significant</p>

Ref. no.	Name / Organisation	Detailed comment
		<p>opportunity to explore the potential of the Sainsbury's site to provide a sustainable mixed-use redevelopment. Sainsbury's is keen to explore options to contribute to the redevelopment of the site and surrounding area where this assists the Council to meet the current and future demand for housing within the Borough and its need to meet and exceed its London housing targets (3,150 new homes between 2015 and 2025). We believe that the site has significant potential to deliver a replacement foodstore which continues to provide a key shopping facility for the local community, whilst also delivering much needed new homes within the borough.</p> <p><b>Suitability of the Site for Housing</b></p> <p>The suitability of the site for housing has already been identified by the Council within its own evidence base. As such, it is not consistent that the Council has not included the site within the current draft document as an allocation.</p> <p>In particular, the Council identified the suitability of the site within its Local Housing Availability Assessment in February 2008. Within this document, it is identified that the site could accommodate between 60 and 255 new residential units, depending on building heights.</p> <p>Furthermore, and in accordance with the NPPF, the Council's latest Annual Monitoring Report (AMR), for the financial year 2013/14, identifies a supply of specific, developable sites or broad locations for growth for years 6-10 (2020- 2025). The document notes that: <i>"To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged"</i>. The document then proceeds to identify a number of sites which the Council considers to be deliverable within the 2020-2025 time period. One of the sites identified as being developable is the Sainsbury's site at Manor Road/Lower Richmond Road. The site is again promoted for between 60 and 255 new homes. Given the above, it is clearly accepted that the Sainsbury's site:</p> <ul style="list-style-type: none"> <li>• Is located within a suitable location for housing development;</li> <li>• Has a reasonable prospect that the site is available; and</li> <li>• Could be viably redeveloped.</li> </ul> <p>Overall, the Sainsbury's site is clearly important in assisting the Council to demonstrate a robust housing land supply and it could deliver a significant quantum of high quality new homes. Given this, we consider that it would be remiss to not include the site as an allocation within the emerging Local Plan Review document. Sainsbury's agrees that the site is developable and is willing to work with the Council to look at options to bring the site forward. Indeed, Sainsbury's has already undertaken initial analysis of the potential capacity of the store. However, this analysis has shown the Council's indicative number of between 60 and 250 is an underestimate of the actual capacity. Instead, we consider that the site could accommodate somewhere in the region of 350 – 500 new dwellings in addition to the re-provision of the store. As such, we consider that any allocation for the mixed-use redevelopment of the site should allow for provision of residential units on the site within this range.</p> <p><b>Retention/Re-provision of Existing Uses</b></p> <p>Notwithstanding the above, Sainsbury's is clear that it wishes to and will retain this important existing store. It serves as a key facility for the local community. Sainsbury's use of the site for a foodstore is well established and any proposed allocation must allow for the continued use of the site as a foodstore. Recognition of the existing use of the site, and the potential for this use to continue, is fundamental in the formation of a robust policy allocation. The above simply re-enforces the suitability of the site for mixed-use redevelopment, combining the existing retail use with much needed housing. Sainsbury's is currently developing a number of its existing stores in London. Its approach to high quality design and maximising the beneficial mixed re-use of existing store sites is exemplified by the Nine Elms and Fulham redevelopments. Both of these schemes are currently under construction. In addition, and in bringing forward this allocation, we also consider that viability matters are considered and flexibility is incorporated into the policy to take account of this. This particularly relates to proposals to redevelop supermarkets which inevitably necessitate a period of</p>

Ref. no.	Name / Organisation	Detailed comment
		<p>closure and / or a significant loss of trade during construction. All of these factors can impact upon Sainsbury's ability to provide policy compliant redevelopment.</p> <p><b>Conclusions</b></p> <p>We trust that that the above representations will be considered appropriately as part of the Local Plan Review process such that the Sainsbury's site will be taken forward as a mixed-use allocation for retail and residential uses. Furthermore, we would welcome the opportunity to meet with officers to discuss the redevelopment options for this site and discuss how Sainsbury's can assist the Council in promoting it. In the meantime, please let us know if you have any queries and we would be grateful if you could keep us informed of the Council's preparation of this Local Plan document.</p> <p><i>See the Appendix (8) to this document for a Site Location Plan.</i></p>
56.	Cllr Liz Jaeger	<p>Thank you for confirming that we can revisit the site allocations that were consulted on a while back. As discussed, I see that the telephone exchanges in both Teddington and East Sheen are proposed to be allocated for employment/office use. Whitton telephone exchange was in the earlier consultation:</p> <p><b>WT 3 Kneller Hall Telephone Exchange, Ashdale Road, Whitton Proposal Residential, including affordable residential units</b></p> <p><b>Justification</b></p> <p><b>3.6.3</b> Should this site become surplus it should be redeveloped for residential use, including affordable housing. The residential to include a mix of unit sizes. Main access from Ashdale Close with pedestrian access to the public car park. Heights and design to complement existing surrounding residential area. I responded, saying I thought it should be earmarked for office/employment. Officers disagreed. But given how much office and employment space we are losing, perhaps you might reconsider.</p> <p>A couple of other things:</p> <p>On CP18, I wonder with hindsight what policies could have helped secure Ryde House and Udney Park for schools. Is there a role here for strategic compulsory purchase? Finally, on policies DM TP8 &amp; DM TP9, I should like some consideration given as to whether we try to protect shared driveways from being built on. We spoke about this a while ago in relation to a problem in Crane Way in Whitton But I guess this may be for later when we are looking at the detail in the wording.</p> <p><i>See the Appendix (9) to this document for Crane Way Photo.</i></p>
57.	Katherine Jones, Savills obo Thames Water	<p>As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the Richmond Borough and are hence a "specific consultation body" in accordance with the Town &amp; Country Planning (Local Planning) Regulations 2012.</p> <p>We have the following comments on the Local Plan consultation:</p> <p><b><u>Water and Wastewater Infrastructure - Policy DM SD 9 Protecting Water Resources and Infrastructure and Policy DM SD 10 Water and Sewerage Provision of the Development Management Plan and Policy CP16 Local Services / Infrastructure of the Core Strategy</u></b></p> <p>A key sustainability objective for the preparation of the new Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure.</p> <p>Contrary to Appendix 1 of the consultation in relation to Policy DMSD10, there are specific references to water and sewerage infrastructure in the National Planning Policy Framework (NPPF). Paragraph 156 of the NPPF states: "<b>Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....</b>"</p> <p>Paragraph 162 of the NPPF relates to infrastructure and states: "<b>Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.</b>"</p> <p>The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on 'water supply,</p>

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		<p>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 <b>“Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</b></p> <p>Policy 5.14 of The London Plan, March 2015 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and Policy 5.15 relates to Water Use and Supplies.</p> <p>Thames Water therefore support Policies DM SD 9 Protecting Water Resources and Infrastructure and DM SD 10 Water and Sewerage Provision of the Development Management Plan and Policy CP16 Local Services / Infrastructure of the Core Strategy.</p> <p><b><u>Sustainable Drainage – Policy DMSD7 Sustainable Drainage</u></b></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:</p> <ul style="list-style-type: none"> <li>• improve water quality</li> <li>• provide opportunities for water efficiency</li> <li>• provide enhanced landscape and visual features</li> <li>• support wildlife</li> <li>• and provide amenity and recreational benefits.</li> </ul> <p>Thames Water therefore support Policy DMSD7 Sustainable Drainage of the Development Management Plan.</p> <p><b><u>Proposed Housing Sites</u></b></p> <p>The attached table provides wastewater infrastructure site specific comments on the housing sites from desktop assessments, but more detailed modelling may be required to refine the requirements.</p> <p>These sites have been assessed on an individual base with only limited opportunity to consider cumulative impacts. Therefore, the impact of multiple sites in the same area coming forward may have a greater impact. The scale, location and time to deliver any required network upgrades will be determined after receiving a clearer picture of the location, type and scale of development together with its phasing.</p> <p>Where we have identified sites where drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development, in the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure required to support the development in line with Policies DM SD 9 Protecting Water Resources and Infrastructure and DM SD 10 Water and Sewerage Provision of the Development Management Plan and Policy CP16 Local Services / Infrastructure of the Core Strategy.</p> <p>It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.</p> <p>We would welcome the opportunity to meet with the Council to discuss the wastewater infrastructure needs relating to the sites in the Local Plan as identified in the attached table.</p>

Ref. no.	Name / Organisation	Detailed comment															
		<table border="1"> <thead> <tr> <th>Site ID</th> <th>Site Name</th> <th>Waste Response</th> </tr> </thead> <tbody> <tr> <td>24141</td> <td>Barnes Hospital, South Worple Way, Barnes</td> <td>We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</td> </tr> <tr> <td>41238</td> <td>Cassel Hospital, Ham Common, Ham</td> <td>We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. 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For example: local network upgrades can take around 18 months to 3 years to design and deliver.</td> </tr> <tr> <td>8088</td> <td>Friars Lane Car Park, Richmond</td> <td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td> </tr> <tr> <td>49789</td> <td>Ham Central Area, Ham</td> <td>We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. 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		41228	Hampton Delivery Office, Rosehill, Hampton We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
		49793	Hampton Square, Hampton Due to the complexities of wastewater networks, the level of information available does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for the site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the wastewater infrastructure needs relating to the proposals in the Local Plan.
		41227	Hampton Traffic Unit, 60-68, Station Road, Hampton We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
		49790	Kew Biothane Plant, Mellis Avenue, Kew The Kew Biothane plant is currently a Thames Water site. There are wastewater network capacity constraints in the area. Thames Water will be working with the developer to ensure that the foul flows from the development can be accommodated. Given the network capacity constraints we would recommend that the Local Planning Authority should require the developer to provide a detailed drainage strategy informing

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			what drainage infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure.
		49786	Mereway Day Centre, Mereway Road, Twickenham On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
		41237	Mortlake And Barnes Delivery Office, 2-12 Mortlake High Street, Mortlake On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
		2016	Platts Eyot, Lower Sunbury Road, Hampton We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
		2113	Richmond Station and above track, Richmond On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
		14385	Rugby Football Union, Whitton Road, Twickenham We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

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49792	St Michael's Convent, Ham Common	Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the wastewater infrastructure needs relating to the Local Plan.
2489	Stag Brewery, Lower Richmond Road, Mortlake	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
49785	Strathmore Centre, Strathmore Road, Teddington	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
41229	Teddington Delivery Office, 19 High Street, Teddington	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
49791	Telephone Exchange, East Sheen	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
49784	Telephone Exchange, High Street, Teddington	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

Ref. no.	Name / Organisation	Detailed comment
58.	Katie Brown, Nathaniel Lichfield & Partners obo St Mary's University	<p>On behalf of our client, St Mary's University (SMU), we are writing in relation to the above consultation. NLP has previously submitted representations to the Council's emerging Site Allocation Plan (in November 2013 and July 2014) on behalf of SMU and we are pleased to further engage with the Council in its review of the Local Plan. We summarise below the background to our representation and then provide comments on the site allocation and proposed rationale and scope of the policy review.</p> <p><b>Background</b></p> <p>SMU is an important community asset delivering benefits to the local economy. It generates high levels of employment both directly (with approximately 800 staff) and indirectly with a turnover of some £40M.</p> <p>SMU has an identified need to deliver investment at the University, reflecting its growth plans. Having achieved full University status in 2014, and with the introduction of the £9,000 per year tuition fees, expectations of students continue to increase and SMU needs to ensure it continues to deliver the quality of facility expected. SMU Estates Strategy recognises that the campus and its facilities are critically important factors in recruiting and retaining both staff and students and providing teaching excellence. It is vital that SMU is able to continue providing students with excellent teaching, support and guidance if it is to continue to thrive and maintain its position. The University currently has a registered population of around 6,000 (4,700 FTE), which is expected to increase closer to 12,000 (9.283 FTE) by 2025. This places pressure on both learning and living facilities. Much of the existing facilities on site are in need of modernisation and upgrade, if the university is to deliver to a high standard and support its student population. We expand on this below.</p> <p>A number of existing buildings on site, while operational and well maintained, require future investment in order to adapt to and deliver modern teaching standards. Over half of SMU's teaching and learning space was built before 1960, with a number of these buildings listed, and several that would benefit from improvements, redevelopment and rebuild. Despite some upgrading, the existing facilities are not sufficient to support the current student population and risk failing to provide a satisfactory high quality space. Of key consideration for future development is the Learning Resource Centre which has remained materially unchanged from 1995, despite the student population nearly doubling. Further there is an identified need for additional lecture theatres and teaching rooms that are able to support larger classes. The existing sports facilities are also important for educational and social purposes and will require ongoing investment in order to support academic and community need, now and well in to the future. SMU also has a direct need for affordable residential accommodation for its students. Currently only 700 live on campus and there is an identified need for 1,645 beds. This is expected to increase to 3,249 beds in 2025. SMU is aware of the site constraints at its main campus on Waldegrave Road. A large proportion of the site is designated as Metropolitan Open Land (MOL), the northern part of the site is designated as a Historic Park and Garden (Grade II*), the southern part of the site falls within the Waldegrave Park Conservation Area, and there are a number of statutorily listed buildings (including the Grade I listed Strawberry Hill House) on the site. On the basis of these potential site constraints, and the identified investment need, SMU is working closely with Useful Studio to develop a Masterplan for the campuses to ensure the future need is accommodated in an appropriate way. This will ensure a holistic approach to future development that will accommodate growth and capitalise on existing strengths. It will use existing space more efficiently to provide sustainable education and ancillary uses that take into account the heritage and environmental value of the site. SMU and Useful Studio have been liaising closely with the Council in developing this Masterplan (Paul Chadwick and Andrea Kitzberger in the planning policy department). It is envisaged that once agreed, the Masterplan may then come forward as a Supplementary Planning Document.</p> <p><b>Representation</b></p> <p>In view of the above, SMU is seeking to establish a position through the Site Allocations Plan to allow St Mary's to upgrade its facilities, predominantly on site. It also has an interest in ensuring the development management planning policies which come forward in due course are effective in ensuring its vision for the site is realised. We deal with each point in turn.</p>

Ref. no.	Name / Organisation	Detailed comment
		<p><b>1. Proposed Site Allocation</b></p> <p>SMU continues to support the proposed allocation of its main campus on Waldegrave Road through the Site Allocations Plan. This site allocation will establish the principle of development on this constrained site, to allow SMU to deliver the investment needed. SMU has demonstrated through the preparation of the Masterplan that it is committed to delivering this site in the course of the Plan period. The site is owned by SMU, and therefore also available for development.</p> <p>The proposed allocation will therefore be an effective policy allocation. The guidance within the NPPF recognises that “<i>the planning system should play an active role in guiding development to sustainable solutions</i>” (para 8) and advises that “<i>LPAs should positively seek opportunities to meet the development needs of their area...</i>” (para 14). The London Plan (Policy 3.18) states that the Mayor will support the provision of higher education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice. It also states that in preparing their LDF’s, Boroughs should provide the framework to secure sites for future provision, recognising local needs and the particular requirements of the education sector. The proposed allocation at St Mary’s is fully in accord with this.</p> <p>We note this consultation does not request comment on detailed policy wording but would invite the Council to review our previous submissions to the formal consultation on the Site Allocations DPD in relation to the wording of the policy, and the need to ensure flexibility in the development being delivered. We would also encourage recognition from the Council in the policy that temporary planning permissions may be required for the change of use of buildings, both on and off the campus, for temporary decant/transition space. We will provide any further comment as required during the next stage of consultation on this document.</p> <p><b>2. Review of Planning Policies</b></p> <p>We have reviewed Appendix 1 of the Local Plan consultation documents that outlines the rational and scope for review of Core Strategy (2009) and Development Management Plan (2011) policies. To confirm, we will review policies appropriate to SMU in more detail once draft wording has been published in the first consultation on the Draft Local Plan (Pre-Publication), expected Summer 2016. Notwithstanding this, we confirm that in principle we support the rational and scope for the review of the following policies:</p> <p><b>DM OS 2 (Metropolitan Open Land):</b> we consider some release of MOL may be justified to deliver comprehensive redevelopment sites, especially when this is facilitated through a masterplan; and</p> <p><b>DM OS 9 (Floodlighting):</b> SMU has a number of important sports and recreational facilities within the borough. These require floodlighting to ensure their effective operation and we agree a more relaxed approach to their erection is appropriate where they serve an important need.</p> <p><b>Conclusion</b></p> <p>We trust that the above comments assist in the review of the Local Plan and Site Allocations. We consider that the comments above will assist in facilitating the sustainable development of the site, which is central to planning policy at all levels. We look forward to continuing a dialogue with the Council on the emerging masterplan which we expect will help inform the future wording of the proposed site allocation. If you have any queries or require any further information in relation to these comments please contact Neil Goldsmith or me.</p>
59.	Caroline Wilberforce, Indigo Planning Limited obo Ashill Land Limited	<p>We act on behalf of Ashill Land Limited and write in response to the above consultation. This representation is to recommend that the site at 9 Tudor Road and 27 Milton Road, Hampton, TW12 2NH is allocated for residential development. A site location plan is enclosed. Ashill Land is the freeholder of the site and it is immediately deliverable for development. In accordance of paragraph 8.2.1 of the Local Plan Consultation document, we set out details below confirming that residential redevelopment of the site would help to meet an acknowledged need for new housing within the borough, as set out in policy CP14 of the Core Strategy, and, in particular, for family sized accommodation, in accordance with DM H0 4 in the Development Management Plan.</p>

Ref. no.	Name / Organisation	Detailed comment
		<p><b>Site and Surroundings</b></p> <p>The site comprises a plot of land (0.12 hectares) which has frontages onto both Tudor Road and Milton Road, with vehicular access gained from Tudor Road. It is a brownfield site, close to a local parade of shops and also within easy walking distance to Hampton railway station. The site has a PTAL rating of 2 and is located within Flood Zone 1. Up until 2011 the site and its buildings were used for car sales on the front forecourt facing onto Tudor Road, with car repairs and servicing carried out in the ancillary workshop to the north of the main commercial building. In the past the car sales area was previously used as a petrol filling station.</p> <p>All of the commercial buildings are now vacant following the closure of the business in 2011. The site also contains a vacant residential dwelling (approximately 365sqm), which is accessed through the main commercial building with a frontage to Milton Road. The surrounding area is primarily residential in character with a mix of two and three storey semi-detached and terraced properties. Frontages to Tudor Road and Milton Road comprise a variety of dwellings and garages. Opposite the site on Tudor Road is a small garage repair workshop.</p> <p><b>Justification</b></p> <p>This section provides a high level overview as to why this site is suitable for housing. Existing uses The Development Management Plan (DMP) (2011) classes employment land as: <i>Land/sites that “includes, but is not exclusive to, land lawfully used for general industrial, light industrial, business, and office use, storage and distribution, business parks, specialist technology, research and development”</i>. Based on the most recent uses at the site, only the ancillary workshop (B2 use) is classed as employment land. This forms a small part of the site as the former car showroom and petrol filling station, which are both sui generis, form the majority of the site. Therefore, this proposal would only result in a minor loss in employment space (approx. 300 sqm). Whilst the Council will normally require employment sites to remain in employment use, policy DM EM 2 of the DMP does confirm that the use of such land for other purposes would be acceptable if: <i>“There is satisfactory evidence of completion over an extended period of time of a full and proper marketing exercise of the site” or “the location has such exceptionally severe site restrictions due to very poor access and servicing arrangements that its continued employment use would be inappropriate.”</i></p> <p>Importantly, Paragraph 22 of the National Planning Policy Framework 2012 (NPPF) states that: <i>Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.</i> The former occupiers of the site, Griffin Autosales, ceased trading in 2011. It only employed a limited number of people. Since then the site has been marketed but has failed to provide any serious interest. This clearly indicates a lack of demand for any type of employment use on the site. The lack of interest has partly been because of the site’s location within a predominately residential area with a limited street presence. The surrounding streets are also narrow, providing difficult access for larger vehicles, restricting the potential alternative employment possibilities.</p> <p><b>Proposed housing</b></p> <p>Taking into account the above justification for the change in use, and also the fact that the surrounding land use is predominately residential, housing is the most appropriate alternative use for this site. Paragraph 51 of the NPPF states that local planning authorities should: <i>... normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.</i> Core Strategy Policy CP14 targets 270 dwellings per year for Richmond. Since the adoption of the Core Strategy, the London Plan’s housing targets have been revised. In Richmond the housing target has increased to 3,150 dwellings between 2015 and 2025; this equates to an annual target of 315</p>

Ref. no.	Name / Organisation	Detailed comment
		<p>dwelling. As such, there is an overriding need for more housing within the borough. With respect to the type of housing most needed, the Housing Annual Monitoring Report (2014) states that: <i>“family housing is encouraged in many of the borough’s established residential areas, where first and foremost new family housing is likely to be compatible with local character.”</i></p> <p>This is followed through in policy DM HO 4 that encourages family sized accommodation in locations such as Tudor Road/Milton Road. In recent years the type of accommodation generally provided in the borough has not matched the greatest need. For example, in 2013/14, 36% of all housing completions were studio or one bed units; this exceeds the 25% set out in the Core Strategy. Therefore residential redevelopment of this site can help to address this particular housing need in the borough, in accordance with policies in the Core Strategy and Development Management Plan.</p> <p><b>Summary</b></p> <p>This vacant brownfield site represents an opportunity to contribute positively to the supply of family housing in the borough. Family housing would be in keeping with the character of the surrounding residential area and offer an opportunity to improve the appearance of the site and amenity of neighbours. We recommend that the site is included within the emerging site allocation document. We would be happy to meet with the Council to discuss the allocation further. Please contact me if you have any questions.</p>
60.	Tanja El Sanadidy, Indigo Planning obo Shepherd Enterprises Limited	<p>We are writing on behalf of our client, Shepherd Enterprises Limited, to make representations in respect of the council’s consultation on the scope and rationale for review of planning policies (Core Strategy 2009 and Development Management Plan 2011), together with the emerging site allocations. Shepherd Enterprises Limited is the owner of the land at 1D Becketts Place, Hampton Wick, KT1 4EW and is intending to implement a residential use at the site following the recently approved prior approval (15/3256/GPD15) from office (B1 use) to residential (C3).</p> <p>We object to suggested designation of the site as part of the wider designation of Lower Teddington Road as a “Key office area” in Hampton Wick, as set out in chapter 6 “Proposed protection of key office areas” and the map shown under paragraph 6.1.5 of the consultation document. It is stated that the designation as a “Key office area” is applicable to sites subject to an Article 4 Direction and part of the Local Plan Review. The council has given notice on 4 September 2015 of an Article 4 Direction to remove permitted development rights for the change of use from office to residential. It is proposed that this will come into effect on the 1 October 2016. To support the making of the Article 4 Directions the council has carried out “significant research” as stated within the consultation document. We have been trying, without success, to obtain this background information. However, the designation as a “Key office area” is based on this Article 4 Direction whose main purpose is to protect against the loss of office floor space within the Borough.</p> <p>Our view is that the designation of 1D Becketts Place and its immediate surrounding area as a “Key office area” is not applicable and not appropriate. Reasons and justification for this are set out in detail below. The proposed designation as a “Key office area - Lower Teddington Road/Hampton Wick” runs from north of the railway line of Lower Teddington Road down to the roundabout at Kingston Bridge, including properties on the east side of Lower Teddington Road and east of Upper Teddington Road, with scattered ‘tails’ to the west of the roundabout. 1D Becketts Place is located on the banks of the River Thames just south of the railway line and lies almost centrally within the proposed designation.</p> <p>Hampton Wick and the area around 1D Becketts Place is defined as one of Richmond’s neighbourhood centres within Richmond’s Core Strategy and is ranked below major town centres, district and local centres. The council state that neighbourhood centres are places that should provide services and shops for day to day needs. Key objectives for these areas are to encourage a wider range of shops and services as well as attracting other uses of an appropriate scale.</p> <p>Office uses are classed as main town centre uses within the National Planning Policy Framework (NPPF) and should therefore be directed accordingly. Policy CP8 Town and Local Centres of Richmond’s Core Strategy clearly sets out the focus of neighbourhood</p>

Ref. no.	Name / Organisation	Detailed comment
		<p>centres on improving the provision of shops and services, and does not mention the provision of office or other B uses. There is no reference to office uses. To support our view we have carried out a desktop review of uses, mainly along Lower Teddington Road using the council's planning records, Google Street View and Estate's Gazettes search tool. This was supported by several site visits between September and December 2015. The results show that the area is predominantly of mixed use accommodating office, retail and residential use. Residential uses on upper floors and office use on ground floors dominates the banks of the River Thames, especially south of the railway line. The majority of properties north of the railway line facing Lower Teddington Road are used as offices and more mixed with residential use south around Kingston Bridge. Leading up to Hampton Wick train station the area is mainly occupied by A-uses on ground floors with residential use above. Therefore the results clearly show an area of mixed use character and cannot be considered as a "Key office area".</p> <p>This can be further supported by planning history and recent planning decisions, especially for the site and area around 1D Becketts Place. In 2005 Becketts Warf &amp; Osborne House north of Becketts Place was granted planning permission (05/1058/FUL) for mixed uses including office and 25 residential units. The adjacent property at Spinnaker Court is of mixed use with commercial use on ground floor level and residential above. Properties along Marina Place are of mixed use (office and residential) and 2-23 Becketts Place is completely in residential use. In September 2015 Shepherd Enterprises Limited secured prior approval (15/3256/GPD15) for the change of use from office to residential and fully intends to implement a residential use. This consecutive row of properties facing the River Thames demonstrates an area of mixed use, and therefore do not show characteristics of a "Key office area".</p> <p>As set out, above we believe that the designation of the area as a "Key office area" is inappropriate due to the characteristics of the area. Considering the above we therefore suggest either removing Hampton Wick from the suggested "Key office area" or amendments to the boundary of the designation taking into account recent planning decisions and current uses for the area stretching from south of the railway line to Kingston Bridge facing the River Thames. Paragraph 22 of the NPPF states that "<i>planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose</i>". As prior approval for the change to residential use for 1D Becketts Place has been granted in September 2016 there are no reasonable prospects that this site will be used as employment and the protection of the site by planning policy is therefore unnecessary.</p> <p>We consider that the existing office/employment floorspace in mixed use areas such as this can be afforded sufficient protection through more general loss of employment policies rather than imposing unnecessarily restrictive designations.</p> <p>We trust that the above is clear and that the representation on behalf of Shepherd Enterprises Limited will be registered and taken into account when considering the scope and rationale of Richmond's Local Plan Review. We would appreciate confirmation that the representation has been registered by the council's planning policy team. If you should wish to discuss anything, please do not hesitate to contact me or my colleague Phil Villars.</p>
61.	Louise Spalding, Defence Infrastructure Organisation	<p>I enclose comments on the local plan review from DIO part of Ministry of Defence.</p> <p>I also enclose a plan showing the extent of Kneller Hall (Military School of Music) in Twickenham.</p> <p>As you know this site was one of a number of sites, announced on January 18 2016 for disposal, by Mark Lancaster (Minister for Defence Personnel and Veterans). The announcement to release the site for disposal is part of the MOD Footprint Strategy which aims to provide a smaller more sustainable estate in support of military capabilities by 2040. I would like the site (Kneller Hall) as shown on the enclosed plan, to be added to the list of sites to be allocated for development. The site will be available for development during the local plan period. The site is suitable for mixed use development, which respects the Metropolitan Open Land, and achieves a lasting use for the listed building of Kneller Hall.</p> <p><b>Appendix 1 rationale and scope for review of policies</b></p>

Ref. no.	Name / Organisation	Detailed comment
		<p>DIO support the intention to review and will engage in debate on the following policies in the next stage of the local plan.</p> <p>CP1 Sustainable development  DMSD1 Sustainable Construction  DMOS2 Metropolitan Open Land  DMOS6 Public Open Space  DMDC4 Tree Strategy:- the balance between protection of existing trees and planting of new ones on a qualitative basis  CP14 Housing :-- policy should follow the results of the SHMA  CP15 Affordable housing  DMHD2 conservation of listed buildings  DMHO4 Housing mix and standards  DMH06 Delivering affordable housing  CP16 Local services/Infrastructure  CP19 Local business  DMEM1  CP20 Visitors and tourism</p> <p><b>Appendix 2 Proposed Site Allocations</b>  See letter and enclosed plan</p> <p><b>Appendix 4 SHMA</b>  DIO welcomes its inclusion, and highlights the need to be compatible with the GLA studies and findings.  <i>See the Appendix (10) to this document for Kneller Hall boundary map</i></p>
62.	Marie-Claire Marsh, Nathaniel Lichfield & Partners obo Rugby Football Union	<p>This letter has been prepared by Nathaniel Lichfield &amp; Partners (NLP) on behalf of our client, Rugby Football Union (RFU), and comprises formal representations to the Local Plan Review in respect of the emerging Richmond upon Thames Local Plan. Twickenham Stadium is owned by the RFU and has been the national stadium for the England rugby team for over 100 years. Over the past 25 years the RFU have gradually modernised the site to increase seating capacity, improve spectator comfort and meet modern safety requirements. In addition to improvements to the stadium and a range of operational facilities, and associated uses, planning permission has also been granted for residential development on the site. These all support a vibrant range of sporting and other commercial operations which are part of the business typical of major stadia. The site comprises the 82,000 seat stadium, and uses at ground floor such as a hotel, banqueting and conference facilities, and a gymnasium. To the north-west and south-west of the stadium there is extensive hard-surfaced parking areas as well as plant and storage.</p> <p><b>Site Allocation</b>  Appendix 2 of the Local Plan Consultation document sets out the sites that are proposed for allocation, with a description of key features and proposed land uses. Page 39 comprises the 'Rugby Football Union, Whitton Road, Twickenham' site, and is accompanied by the following text:</p> <ol style="list-style-type: none"> <li>1. Need to protect and enhance nationally important sports venue with associated facilities</li> <li>2. Potential need for associated new and complimentary facilities such as a hotel, leisure centre / training facilities</li> <li>3. There is a general need for new office floorspace in the borough and this site may provide the opportunity for businesses or a business park</li> <li>4. Need to retain sufficient parking particularly for coaches, servicing facilities and space for spectators and related service</li> <li>5. Need to protect and enhance the Duke of Northumberland River and the associated Metropolitan Open Land.</li> <li>6. If any land is declared surplus to requirements by the RFU, the preference would be for uses that are associated /</li> </ol>

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		<p>complimentary to the stadium and/or businesses; any other/new uses would need to be compatible with the main use of the site, i.e. the stadium, and take into account the sewerage treatment works to the north of the site. The above text is flexible and creates a positive vision for current and future uses at this international site and RFU agree with the majority of the above issues and uses. However, it is considered that the site should not incorporate MOL and we set out our comments below in respect of the site's designation as Metropolitan Open Land (MOL), contained at designation number 5.</p> <p><b>Metropolitan Open Land</b></p> <p>As detailed on the Proposals Map (extract below), to the west of the site is the Duke of Northumberland river corridor. Further to the west of this is green space comprising training grounds and a sports pavilion. As detailed on the above extract from the Proposals Map, the MOL boundary extends across the training grounds, the river corridor and onto the RFU site to the east. Uses within the 'MOL' designation, on the RFU site, have comprised extensive car park areas, storage, temporary marquees, plant and circulation space.</p> <p>We note that the Local Plan Review states that LBRuT are not proposing to review their MOL boundaries (with the exception of the Harroddian School, discussed below). However, RFU do not agree with this as local authorities should use the opportunity, when reviewing policies within their Development Plan, to ensure that they are consistent with each other, as well as national planning policy. This is particularly the case because London Plan Policy 7.17 states that "any alterations to the boundary of MOL should be undertaken by Boroughs through the LDF process, in consultation with the Mayor and adjoining authorities". In respect of designating land as MOL, Policy 7.17 states that boroughs need to establish that the land in question meets at least one of the following criteria:</p> <ol style="list-style-type: none"> <li>1. it contributes to the physical structure of London by being clearly distinguishable from the built up area</li> <li>2. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London</li> <li>3. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value</li> <li>4. it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.</li> </ol> <p>The requirements set out at Policy 7.17 in respect of designating land as MOL, should also apply when authorities decide whether the land should be retained or removed from an existing MOL designation. Land contained within the MOL designation has a strong presumption against development, both at national and local level. Therefore, in respect of Twickenham Stadium, there is currently a general presumption against any further development in this area that aids the future growth of the national stadium. This, in our view, is unnecessary and contrary to the spirit of National and Strategic policy that seeks to support such facilities. It is clear that the area of land designated as MOL is not open green space. It is developed land that has been used for ancillary uses by the RFU for in excess of 30 years. The site is:</p> <ol style="list-style-type: none"> <li>1. not clearly distinguishable from the built up area, indeed it is part of the built up area;</li> <li>2. it does not include open air facilities for leisure, it currently comprises car parking, plant and storage facilities;</li> <li>3. it contains no features or landscapes</li> <li>4. it does not form part of a green link.</li> </ol> <p>As such, this area of land clearly does not meet any of the above criteria set out at Policy 7.17 of the London Plan, and therefore there is no justification for this area to maintain MOL status. The MOL designation places a very significant constraint on the national stadium and RFU's ability to continue to enhance the stadium and facilities which prohibits the stadium from remaining internationally competitive and significant.</p> <p>In this regard, neighbouring boroughs, such as the London Borough of Hammersmith and Fulham, have undertaken similar exercises when reviewing their MOL boundaries. For example, the Council removed the Linford Christie Stadium from its MOL</p>

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		<p>designation as it recognised that the sports stadium did not contribute to the green character of the borough or London or only met one of the four criteria set out at Policy 7.17. The Council stated that <i>“The removal of the stadium from MOL and its release from the restrictive MOL policy will make it easier for the development of improved sports facilities on the site should proposals come forward”</i>. The GLA have advised that there have been changes to MOL boundaries in a number of other Boroughs.</p> <p>In respect of the Harrodian School in Barnes, we understand that the Council has publicly consulted on the removal of the MOL designation from the south-west corner of the site. The Council states that this is to take “account of the cluster of buildings in the south-western corner, which can be distinguished from the predominantly open character of the remainder of the site”.</p> <p>The Council has acknowledged that this part of the wider Harrodian School site does not accord with the Policy tests set out at Policy 7.17 and is amending the MOL boundary. In light of the above, we request that the Council revise their MOL boundary to exclude the RFU’s land to the west of Twickenham Stadium from the MOL designation. The site specific policy for Twickenham Stadium should therefore be updated and delete reference to the associated MOL.</p> <p><b>Suggested Site Allocation</b></p> <p>London Plan (FALP 2015) states at Policy 3.19 that: <i>“Within LDFs Boroughs should assess the need for sports and recreation facilities in line with the NPPF (paras. 73-74) at the local and sub-regional levels regularly, and secure sites for a range of sports facilities”</i>. The NPPF states at paragraph 8 that “the planning system should play an active role in guiding development to sustainable solutions” and advises that “LPAs should positively seek opportunities to meet the development needs of their area...” (paragraph 14). Whilst it is recognised and accepted that facilities at the stadium must be allowed to continue to evolve and meet the latest expectations and standards of a national stadium, such new development has tended to come forward incrementally, with no specific policy guidance. As set out above, national planning policy states that LPAs should positively seek to meet the development needs within their areas, and play an active role in guiding development. In light of the above, and further to the Local Plan Review, we seek to include the following site specific policy that incorporates the designation text at Appendix 2 of this consultation document: <i>“The Council will support the sustainable growth of facilities and associated uses at Twickenham Stadium so that it can continue to provide a world class standard of facilities and visitor experience, appropriate to its status as a national stadium and the international home of rugby. This could include an enhanced stadium and new stadium facilities, sports facilities, ancillary uses and structures for matches and events, including concerts, and other new visitor facilities such as a hotel and conferencing facilities. Residential and/or office developments would also be acceptable. Proposals for new development and uses will be considered positively, provided that the proposed development or new uses would not have a detrimental environmental impact on the surrounding area, in particular residential amenity, and that there would not be an unacceptable impact on the local highway network. Proposals should protect the Duke of Northumberland River.”</i></p> <p><b>Summary</b></p> <p>The RFU is pleased with the site allocation for Twickenham Stadium, contained at Appendix 2 of the Local Plan consultation document. The RFU agree that Twickenham Stadium should have a site specific policy, ensuring flexibility for the site to continue to evolve and enhance the facilities for visitors and ensure it retains its status as the national stadium. However, RFU consider that the Plan should include a review of the Borough’s MOL boundaries, and that the MOL designation should be deleted from the Stadium site, for the reasons outlined in this letter. The existing land within the MOL designation does not meet the MOL tests and as such this land should be removed from the MOL designation through the Local Plan review process. Ensuring the above specific policies for this site would ensure that development is positively and sustainably planned, in line with the requirements of the NPPF.</p> <p>We consider that the proposed revisions set out within these representations are appropriate and will assist in ensuring that the Local Plan is ‘sound’. Please contact us if you have any queries regarding these representations. Given the importance of this document, and national significance of our client’s site, we would welcome the opportunity to meet with you and discuss this</p>

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		site further.
63.	Daniel Osbourne, Barton Wilmore obo Quantum Group	<p>We write on behalf of Quantum Group Management Ltd (“Quantum”), who, as you will be aware, recently acquired Teddington Sports Ground from Imperial College London, and in response to the current Local Plan consultation. Quantum’s ideas for the site have not yet been sufficiently developed to enable us to usefully participate in this current discretionary consultation phase on the Local Plan. The intention is to establish a future strategy for the site over the next few months. We intend to take part in the formal consultation process on the new Local Plan, which we understand is likely to be consulted upon later this year.</p> <p>Quantum looks forward to working with the Borough in developing proposals for the sports ground and would request that we are notified of future Local Plan consultations.</p>
64.	Tor Baret, Nathaniel Lichfield & Partners obo The Harrodian School	<p>On behalf of our client, The Harrodian School Limited, we enclose representations to the London Borough of Richmond upon Thames (LBRuT) on the Local Plan Review consultation document (December 2015) in relation to The Harrodian School, Lonsdale Road, SW13 9QN. By way of background, we previously submitted representations on the Site Allocation Plan pre-Publication consultation (November 2013) identifying the need for a change to the Metropolitan Open Land (MOL) boundary. Following this, we submitted representations to the Site Allocation New Additional Sites Consultation (June 2014) which supported the alteration of the MOL boundary at the School to remove the south west corner from the MOL designation. The School continues to support the proposed alteration of the MOL in the current consultation document. We reiterate our reasoning for support below and also comment on the review of policy DMOS2 ‘Metropolitan Open Land’.</p> <p><b>Proposed Alteration to MOL Boundary</b></p> <p>We note that paragraph 4.5.10 of the Local Plan consultation document states that: <i>“It is not proposed to review the MOL and OOLTI boundaries as part of the Local Plan, with the exception of the Harrodian School in Barnes, where the Council has already publicly consulted on the removal of the MOL designation from the south-western corner, which can be distinguished from the predominately open character of the remainder of the site.”</i> This review of the MOL boundary at the school site is supported. As previously set out in our representations to the New Additional Sites Consultation (June 2014) the School looks to policy in the adopted and emerging Statutory Development Plan to guide and support its continued success and to help it in meeting the on-going needs of its pupils and their families. The current MOL policy designation of the entire school site places a significant constraint on the School and its ability to provide for the needs of the community it serves. National policy within the NPPF attaches the same level of importance – ‘great importance’ – to both the protection of MOL (para. 79) and to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities (para 72). It is against this national policy that the School supports the proposed alteration as removing this section of the site from the MOL designation seeks to fairly balance the future needs of the School with its existing designation within MOL. As explained in our June 2014 representation, this reflects the similar arrangement at St Paul’s School which works successfully.</p> <p>The proposed alteration to the MOL boundary at the school site will result in the school being able to provide for the needs of its children throughout the course of their schooling. The school is a major employer in Barnes and plays an active role in the wider community. Planning policy must serve to support the school and balance its needs against wider planning policy objectives. This change allows for this to happen. If the School remains at a disadvantage to others like it and cannot meet the needs of the pupils, its closure would mean those needs would have to be met elsewhere in the Borough and place a huge additional burden on infrastructure that probably cannot sustain it. Therefore the School continues to support the removal of the south-western corner of the site from the MOL designation. As noted in our previous representations, this change represents a reasonable and balanced application of policy at all levels which relates to protecting MOL and providing for future educational needs.</p> <p><b>Review of Policy DMOS2 ‘Metropolitan Open Land’</b></p>

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		<p>Appendix 1 of the Local Plan Review consultation document sets out the Council's rationale and scope for the review of existing Core Strategy and Development Management Plan Policies. In relation to Policy DM OS 2 (Metropolitan Open Land), it states: <i>"The policy allows for flexibility or exceptions where required, for example in the case of school expansion proposals on MOL."</i> Additionally, it notes: <i>"Consider adding guidance in relation to major schemes (e.g. for regeneration proposals, social community or educational uses), where a comprehensive approach to redevelopment can be taken, that it may be acceptable to consider re-distribution of open land subject to enhancing its strategic importance, quality and other criteria."</i> The school supports the principle of reviewing the existing MOL policy. As identified above, the existing designation places considerable constraints on the ability of the school to continue to develop and enhance its facilities to meet the demands of the students. Whilst it is considered that the alteration of the MOL boundary to remove part of school site addresses this concern, as set out above, the school also encourages the incorporation of additional guidance in Policy DM O S2 in relation to school expansion and redistribution of open land. This approach rightly acknowledges the need to plan positively for education uses which are constrained by MOL. In order to ensure that the policy is clear and effective, the wording of the policy should explicitly refer to the acceptability of school expansion in the MOL and redistribution of open land for education use. This approach would provide flexibility and, in turn, further comfort to the School that in the longer term it has the ability to continue to meet its students' needs without undermining the importance and integrity of the MOL policy. Consequently, this would also allow the school to continue to be strategically important within the Borough as a major employer and in providing school places to meet local demand. We trust that the above comments will be taken into account by the Council during the preparation of the Local Plan Review process. Should you have any questions, or require additional information, please do not hesitate to contact me.</p>
65.	James Sheppard, CBRE obo CBRE Global Investors ('CBREGI')	<p>CBRE Limited (CBRE) acts as planning consultant to CBRE Global Investors ('CBREGI' hereafter) in respect of the Heathlands Industrial Estate, Heath Road, Twickenham ('the site' hereafter). We have been instructed to submit representations in relation to the Local Plan Review consultation. Our client welcomes the opportunity to engage with London Borough of Richmond upon Thames (LBR) in respect of the emerging Local Plan. The consultation document seeks to protect the entire site by way of a proposed site-specific designation, forming part of a new/ revised employment policy, referring to 'proposed protection of key employment land'. On behalf of our client we are seeking to remove the site from the proposed employment allocation, and therefore formally disagree with the indicative identification of the site as illustrated in Appendix 3 and listed in paragraph 7.1.2 of the Local Plan consultation document.</p> <p><i>A case for residential redevelopment</i>  Unsuitability for ongoing employment use:  Policy TWP2 of the adopted Twickenham Area Action Plan states that "existing B2/B8 employment land should be retained unless it is <i>inherently unsuitable for employment uses</i>". In addition to policy TWP2, the Local Plan consultation document proposes that in instances where an "industrial use may be considered detrimental to neighbours' living conditions, there may be some justification to include a requirement that mitigation measures are fully explored before considering other uses". In the case of Heathlands Industrial Estate, it is considered that on-site mitigation resulting in the adequate protection of residential amenity would not be feasible due to the proximity and overlooking of nearby residential properties.</p> <p>We fully advocate the release of this site from employment use primarily due to its negative impact upon the amenity of local residents. There has been a legacy of complaints from neighbouring residential properties, particularly in relation to noise. This situation will be further exacerbated given the recent planning permission (ref: 13/4019/FUL) for residential redevelopment adjacent to the site at Twickenham House, 159 Heath Road. It is as such highly unlikely that the Local Planning Authority would allow the flexible, 24 hour operation of the site required by modern B2/B8 occupiers. The current restrictions limit how effectively occupiers can operate and as such the site does not fulfil occupier requirements.</p>

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		<p>Suitability of a residential proposal:  The site lends itself well to a residential allocation. A residential scheme would ensure an appropriate use for this primarily residential area. We would envisage that local residents would be supportive of a more suitable use given the level of complaint made to the Council in respect of noise and general amenity issues.</p> <p>The site enjoys a close proximity to various sustainable modes of transport including Twickenham and Strawberry Hill train stations and a number of bus routes. In addition, a small Tesco Metro convenience store is located to the north, among a variety of other small shops and services. As such, this location is deemed to be wholly sustainable, in accordance with both NPPF and London Plan (FALP 2015) policies and a residential proposal at the site would increase the vitality of the area, ensuring support for local shops and services. There has been recent precedent set for residential development in this location through the granting of planning permission at Twickenham House, 159 Heath Road. In addition, the Annual Monitoring Report (Housing), December 2014, confirms that there has been a significant under-delivery of affordable housing within the Borough. Subject to viability assessment, the Heathlands Industrial Estate site could help to deliver affordable housing for the Borough.</p> <p>Summary:  In summary, over the plan period, the site will no longer be required for industrial use and has been the subject of a number of complaints from local residents. The site cannot offer the operating flexibility that modern industrial occupiers require, especially given the close proximity of residential properties. This includes any increase in scale or relaxation of hours of operation. It is therefore proposed that a residential allocation would serve the site and locality much better, contributing towards the provision of market and affordable housing, ensuring quiet enjoyment for neighbouring properties. There is a demonstrable need for housing in the Borough and this site represents an available, suitable and achievable site to contribute to the Borough's housing land supply over the plan period.</p> <p>We respectfully request that you acknowledge that these representations have been received and shall be formally considered as part of this consultation process. If you require anything else please do not hesitate to contact me.</p>
66.	Joanna Debs, Harlequin Football Club Ltd	<p><b>Twickenham Stoop Stadium</b></p> <ul style="list-style-type: none"> <li>• Need to retain and enhance continued use as a sporting arena with associated facilities.</li> <li>• Potential need for associated new facilities including a new north stand, indoor leisure (gym/training facilities), business uses, café zone, museum or potentially a hotel.</li> <li>• Need to enhance facility to enable focus and best practice in environmental, social and economic sustainability.</li> <li>• Additional uses need to be complimentary to the main use of the site as a sports ground</li> <li>• Need to protect and enhance the Duke of Northumberland River</li> <li>• Need to retain sufficient parking, particularly for servicing facilities and space for spectators, disabled spectators, cycle parking facilities and related services.</li> <li>• Need to retain pedestrian access to and from local transport links, via Craneford Way.</li> </ul>
67.	Alex Arrol, Goldcrest Land	<p>Goldcrest Land welcomes the opportunity to respond to the current Local Plan consultation that the London Borough of Richmond upon Thames is undertaking. We are a developer that specialises in bringing forward complex brownfield sites within the M25 for residential development, including within Richmond upon Thames. Goldcrest Land is the landowner of the Sandycombe Centre, Sandycombe Road, Kew.</p> <p><b>Employment, Business and Tourism</b></p> <p>Currently the Council's Policy in relation to the loss of employment use is set out in Development Management Plan Document policy DM EM2. This sets out that the Council will seek to retain employment land in employment uses and will only consider other</p>

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		<p>uses where:</p> <ul style="list-style-type: none"> <li>(a) There has been an <u>extended</u> period of marketing</li> <li>(b) A sequential approach to uses for development on site has been applied as follows – employment and then mixed use where employment floorspace is retained (and affordable housing maximised)</li> <li>(c) Maximum provision of affordable housing</li> </ul> <p>The policy goes on to say that where Mixed Use schemes are proposed they must maintain or improve the amount of employment floor space on site and sets out a number of factors the Council will consider on a case by case basis, including: the amount of employment floorspace proposed, the type and mix of uses as existing and proposed; likely access, parking and traffic implications. Para 5.3.9 says that “a site should be marketed for an extended period, normally a minimum of two years”. Furthermore, para 8.3.7.3 of the Core Strategy states that “Where sites are unsuitable for employment use or a mixed use scheme is proposed affordable housing should be maximised <u>above</u> normal requirements set out in CP15”.</p> <p>Goldcrest Land understands the necessity for the Council to protect and safeguard viable employment land and sites in order to provide job opportunities for local people. However, as the Council acknowledges, employment land forecasting models predict a gradual decline in demand for B2 uses and relatively flat demand for B8 uses up to 2026. A requirement for such a long marketing period for any site where employment was the last use is particularly inflexible given this anticipated trajectory of employment need for B2/B8 uses in the Borough. Rather a shorter period of marketing of 12 months should be sought to demonstrate whether an existing employment site remains viable. In this way, there will still be strong protection of employment sites but where sites are no longer viable, but could play an important role in meeting the wider development needs of the Borough, they can be brought forward for development in a more responsive manner.</p> <p>Goldcrest Land also considers it appropriate for the Council to review its current policy seeking to secure a higher provision of affordable housing for employment sites being brought forward for non-employment use. Very often, employment sites can be heavily contaminated resulting in significant remediation costs. This can hinder any form of beneficial use coming forward on the site. Similarly, if a developer is proposing a mixed-use scheme with employment uses on a former employment site, it is most likely because an employment only scheme is not viable. It therefore seems peculiar that the Council would seek a higher level of affordable housing on former employment sites than is sought through its general policy on affordable housing (CP15). This approach will just add to the delay of such sites coming forward to address the chronic need for housing in the Borough and delivering up-dated employment space (in the case of mixed use schemes). For this reason Goldcrest Land is firmly of the view that this policy needs to be revised as part of the forthcoming Local Plan review. Where an employment site is coming forward for alternative uses, or a mixed use employment scheme, it should be assessed against CP15 and the usual requirements that a viability appraisal be submitted if the development is proposing a lower level of affordable housing than required under policy CP15.</p> <p><b>Proposed protection of key employment land</b></p> <p>In reviewing the Local Plan, it is important that the Council properly and accurately assesses their policies and allocations for employment land. The National Planning Policy Framework paragraph 22 states:</p> <p>“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”</p> <p>In this respect Goldcrest Land objects to the identification of Sandycombe Centre, Sandycombe Road, Kew as key employment land. The site is currently not designated/allocated in the Local Plan, although it is identified as a Key Employment Site in the</p>

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		<p>emerging Site Allocations Plan (Pre-publication version for consultation) (2013). The site is vacant so there is no existing employment on the site. The site has been marketed for employment use since April 2015 and it is clear that there is no prospect of securing any viable employment use on the site in its current state. Therefore redevelopment of the site will be required if the site is to return into a beneficial use. It is considered that an entirely employment based redevelopment of the site will not be viable due to the site's constraints. Goldcrest Land therefore considers there to be no justification for the proposed designation or listing of the site as an important industrial estate or business park. However, the site can play an important role in meeting the development needs for the Borough. The site is located in an inherently sustainable location, being close to North Sheen and Kew stations and numerous bus routes, providing the site with a PTAL level of 4. It is set within a predominantly residential area, but is close to numerous facilities, such as a large Sainsburys superstore on Lower Richmond Road, and within easy reach of the services and facilities within Richmond Town Centre. The site is therefore particularly suitable for residential development. Goldcrest Land therefore would support that the site is allocated for the following: "Residential led development. Subject to there being demand, office provision as part of a residential led mixed use scheme will be supported".</p> <p><b>Conclusion</b></p> <p>Goldcrest Land welcomes the review that the Council is undertaking of the Local Plan and the early engagement that has taken place. We object to the proposal to identify Sandycombe Centre as a key employment site in the emerging Site Allocations Plan, for the reasons set out above. We would welcome future opportunities to comment on the Local Plan as it progresses and to work with the Council to bring forward high quality development within the Borough. We would therefore request that we are included within the Council's mailing list for future consultations.</p>
68.	Robert Mackenzie, RPS obo Richmond-Upon- Thames College	<p>On behalf of our client Richmond upon Thames College, please find below the College's response to the Local Plan Review consultation. This letter sets out the College's position on various policies and the proposed allocation of the existing College site. All comments have been made with full regard to the outline planning application (15/3038/OUT) for the redevelopment of the College submitted on 9th July 2015.</p> <p><b>The College Response</b></p> <p>While we understand that at this early stage the Council are yet to settle on the draft wording of any policy updates, there are number of policies which the College considers will have a considerable impact on the redevelopment of the site and on which we would wish to comment at this stage.</p> <p>Accordingly, the College's responses on the various policies are provided below:</p> <p><i>DM SD 2 Renewable Energy and Decentralised Energy Networks</i></p> <p>The Council's recognition that there is relatively low probability of decentralised energy development in the borough is noted. It is anticipated this approach will remain in any rewording of the policy.</p> <p><i>DM OS 8 Sport and Recreation Facilities</i></p> <p>While the College supports the retention of the special protection and presumption against the loss of playing fields, any amendments to the policy should go further than simply referring to the NPPF and Sport England's policy on assessing special circumstance. At very least the policy should recognise that in special circumstances the redevelopment of playing fields will be permitted. The policy should also include the three special circumstance provided in the NPPF:</p> <p>An assessment has been undertaken has clearly shown the open space, buildings or land to be surplus to requirements; or</p> <p>The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity in a suitable location; or the development is for alternative sport and recreational provision, the needs for which clearly outweigh the loss. The policy should also include Sport England's five exceptions to the loss of playing fields. This will provide clarity for the redevelopment of an existing playing fields as well as ensuring the policy is in accordance with Government guidance.</p>

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		<p><i>CP12 River Crane Corridor</i>  The College recognising that while it is important to protect, improve and enhance the River Crane corridor the policy requires specific guidance on what improvements should be made.  The College also agrees that the policy requires updating to accurately reflect the status and progress on the development sites included in the Crane Valley SPG.</p> <p><i>Site Allocation – Richmond upon Thames College, Egerton Road, Twickenham</i>  The emerging allocation for the College appears to have changed considerably since the previous Site Allocations Pre-Publication Consultation document (draft 2013) and does not accurately reflect the proposals which have been brought forward for the site. While a replacement college, science/technology/engineering/ maths centre, new special needs school, technical hub (B1) and new sports centre are all planned for site, the allocation has failed to include the new secondary school and residential units which are necessary for the site to come forward for development.  The submitted outline proposal also includes the playing field to the south of the college. This should therefore form part of the site allocation. The application proposed that this playing field would be upgraded to include a new 3G playing pitch installed.</p> <p><b>Conclusion</b>  Richmond-Upon-Thames College generally supports the Council's proposed changes to the policies in Richmond's Core Strategy 2009 and Development Management Plan 2011. However, the College consider that this review provides the opportunity for further clarifications to be provided regarding the redevelopment of playing pitches and the River Crane Corridor.</p>
69.	Steve Simms, SSA obo Kentucky Fried Chicken (Great Britain) Limited	<p>We disagree with the premises in paragraph 4.8.4 of your draft Scope and Rationale for Review of Planning Policies that (a) certain foods may be considered inherently unhealthy outside of any assessment of lifestyle including activity levels, (b) that 'fast food takeaways' may be easily or fairly defined in planning law or (c) that 'fast food takeaways' are exclusively or even predominantly responsible for poor diet choices. We disagree with the rationale in paragraph 4.8.4 of your draft Scope and Rationale for Review of Planning Policies that the fact that a restriction on the development of further 'fast food takeaways' in close proximity to schools where a concentration of such uses already exists might be considered to limit access to unhealthy foods is supported simply by the evidence that there is an emerging obesity issue in the Borough.</p> <p>In order to be sound, such a policy would require evidence of a causal link between the proximity of a particular concentration of 'fast food takeaways' (however defined) and the incidence of obesity. Far from demonstrating any kind of causal link, studies over the last decade have shown no correlation between proximity and incidence, indicating the opposite conclusion that, in fact, a causal link does not exist. This is because people with a variety of lifestyles, healthy and unhealthy, obtain a variety of foods, healthy and unhealthy, from a variety of sources, near and far from where they live, work, visit or study. As such lifestyles and food sources are so diverse that no one individual pathway has any particular influence. Consequently, overall policy should focus on education and planning policy on encouraging activity.</p> <p>Because of this lack of evidence, there is consequently also no concentration at which adverse outcomes would become significantly more likely and no basis upon which to set a threshold concentration. Indeed, the only evidence likely to support controls on concentration is the degree of variety necessary to support retail, rather than human, health. A specified threshold based on such retail evidence may be sound. Should the approach suggested in the draft Scope be pursued, then we would object for the reasons stated. We would be pleased to work with the plan-making authority to develop a sound approach based on evidence and look forward to doing so.</p>
70.	Andree Gregory, Highways England	<p>Highways England 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). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the</p>

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		<p>public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN).</p> <p>Having examined the above documents, we do not offer any comment to this proposal.</p>
71.	Pauline Holmes, Natural England (Thames Valley Team)	<p>Thank you for your consultation on the above dated 31 December 2015 which was received by Natural England on 31 December 2015. 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.</p> <p><b>Sustainability Appraisal Scoping Report</b></p> <p>Our comments below relate to the individual sections of the scoping report. Our advice covers our strategic environmental interests including, but not limited to, statutory designated sites, landscapes and protected species, geology and soils.</p> <p><b>Section 2 – Context Review</b></p> <p>The list of relevant legislation, plans or policies should also include:</p> <ol style="list-style-type: none"> <li>1. the Natural Environment and Rural Communities Act 2006. The Act sets out the duties of the Local Planning Authority with regard to biodiversity and lists national Priority Habitats and Priority Species which are the subject of specific policies within the NPPF.</li> <li>2. the All London Green Grid (as set out in the London Plan All London Green Grid SPG and associated Area Frameworks) which provides the strategic framework for the delivery of green infrastructure in London: <a href="https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/all-london-green-grid">https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/all-london-green-grid</a></li> </ol> <p>The section on Pg17 covering biodiversity and nature conservation should be updated to correctly detail the responsibilities of the LPA as a Competent Authority under the EU Habitats and Wild Birds Directives. In advance of undertaking an Appropriate Assessment a Competent Authority should first undertake an assessment of Likely Significant Effect of the plan. This should consider the likely impacts of the plan on European Protected Sites within and outside of the Borough and determine if an Appropriate Assessment is required.</p> <p>The section on Pg17 covering climate change should also reflect the role of green infrastructure in climate change adaptation as per NPPF policy 99 which states that “... <i>When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure</i>”.</p> <p><b>Section 3:</b></p> <p>The open space assessment and data does not include consideration of access to nature and natural greenspace. In London the Mayor maps Areas of Deficiency in Access to Nature. This is distinct in London Plan policy from access to open space standards and therefore should also be considered. Natural England have also published Accessible Natural Greenspace Standards to support decision makers in planning for the provision of natural greenspace: <a href="http://webarchive.nationalarchives.gov.uk/20140605090108/http://publications.naturalengland.org.uk/publication/40004?category=47004">http://webarchive.nationalarchives.gov.uk/20140605090108/http://publications.naturalengland.org.uk/publication/40004?category=47004</a></p> <p>Table 35 – conservation and enhancement of biodiversity - should also reflect the mitigation hierarchy and role of plan making in enhancing ecological networks as set out in the NPPF policies 117 and 118.</p> <p>Table 35 – conservation and enhancement of biodiversity – should include European Site Conservation Objectives as an evidence source in addition to SSSI conservation objectives. Natural England publish this information here: <a href="http://publications.naturalengland.org.uk/category/6528471664689152">http://publications.naturalengland.org.uk/category/6528471664689152</a></p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to</p>

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72.	Samantha Davenport, Natural England (Dorset Hampshire Isle of Wight)	<p>contact us.</p> <p>Thank you for your consultation on the above dated 06 January 2016 which was received by Natural England on the same date. 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.</p> <p><b>Sustainability Appraisal (SA) Scoping Report</b></p> <p>Natural England has reviewed the Sustainability Appraisal Scoping report and considers that you have broadly covered the main environmental issues to be assessed.</p> <p>To strengthen the Sustainability Appraisal further Natural England would advise including more information on the following: Landscape and Fragmentation of habitats and species.</p> <p>For landscape, it is noted that you acknowledge that there is potential for the character of the landscape and townscape to be harmfully affected by change, however in your objectives and decision making criteria landscape is not mentioned. We believe it should be.</p> <p>For fragmentation of habitats and species, we do not see this mentioned within your objectives and decision making criteria. Over time isolated and fragmented habitats and species can result in the loss of important habitats and species. As such we advise ensuring that important habitats and species are not fragmented should form</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p>
73.	Lucy Gate, Public Health, London Borough of Richmond upon Thames	<p>Page 13: DM TC 1 – Larger Town Centres: London Plan and Regional Guidance: Could you please add: Healthy Weight Environment TCPA PHE Planning guidance</p> <p>Page 16: DM OS 6 – Public Open Spaces: Add cross reference to link DS OS 7 and the importance of open space for play and recreation</p> <p>Page 18: DM OS 12 – Riverside Uses: Can you add reference to Healthy Weight Environment TCPA PHE Planning guidance and the importance of walkways which are safe and welcoming and add into the rationale and scope for review the importance of walkways which are safe and welcoming for physical activity and play</p> <p>Page 19: CP5-Sustainable Travel: Can you add reference to Healthy Weight Environment TCPA PHE Planning guidance and the importance of walkways for physical active and sustainable environment – include the GLA Sustainable transport plan</p> <p>Page 21: DM TP 7 Cycling Can you add reference to Healthy Weight Environment TCPA PHE Planning guidance and the importance of cycling routes, welcoming lit etc</p> <p>Page 24: CP14 – Housing: Can you add reference to Dementia Friendly Environments (previously shared) – the importance for falls prevention and keeping people independent for longer – I also previously sent some information from the JSNA on this. Add reference to Fuel poverty.</p> <p>Page 26: CP 16 – Local Services/Infrastructure: Can you expand on the detail on bullet point 4 to 6 in the section ‘rationale and scope for review’ to include: Examples in public health are dementia friendly villages and community champions, there is a requirement for the development of physical and social capital</p> <p>Page 27: DM SI 1 – Encouraging New Social Infrastructure Provision: Can you add cross reference or link to Page 20 CP5 Sustainable Transport: Cycling and walking schemes.</p> <p>Page 28: CP 17 – Health &amp; Wellbeing: Can you add into the section ‘rationale and scope for review’ under the last bullet point and before the section on tackling obesity can you add a cross reference to DMT P6 Walking</p> <p>Page 28: CP 17 – Health &amp; Wellbeing: Can you add into the section ‘rationale and scope for review’ under the subsection on takeaways and tackling obesity can you add another small subsection:</p>

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		<p><u>Village Planning and Building Resilient Communities</u>  There is evidence that loneliness and isolation has a significant detrimental impact on physical and mental health. Social infrastructure and social capital in communities provides a sustainable and effective solution to this. In Richmond the Village planning process is being utilised to support the adoption of Dementia Friendly Environment and Communities.  Page 24: CP14 – Housing: Can you add reference to Fuel poverty  For the rest of health and wellbeing you could include cross links to other parts of the plan which reflect a healthy environment – if we do this think we need to be exhaustive – let me know if you would like me to do this</p>
74.	Greg Pitt, Barton Wilmore obo UK Pacific Hampton Station LLP	<p>Further to discussions this afternoon, please find attached the following:</p> <ul style="list-style-type: none"> <li>• Our covering letter that was submitted with the pre-application submission; and</li> <li>• A copy of the Council's formal pre-application advice received on the 30<sup>th</sup> November 2015.</li> </ul> <p>The attached letter from Barton Wilmore clearly sets out in section 4 the democratic process that the MET police has followed in disposing of the Site and that it is surplus to requirements. The site was only a traffic unit used to store classic cars and these have now been moved to Hendon.</p> <p>The pre-application advice received highlights the need to comply with the tests under Policy DMS12, however subject to this officers have advised that residential use would be considered acceptable and add to the vitality and viability of the mixed use area. In our opinion, the latest draft of the site allocation, contradicts this advice. As discussed on the phone, a planning application for 28 residential units is due to be submitted imminently (12<sup>th</sup> or 15<sup>th</sup> February 2016) and we have undertaken public consultation on the proposed development. As illustrated by the graph below the overwhelming preference from local resident's and Councillors who attended the consultation is for residential development. I hope the information above and attached is helpful and please do not hesitate to contact me if you wish to discuss anything further.</p> <p><b>PRE-APPLICATION REQUEST</b></p> <p>We write on behalf of our client, UK Pacific Hampton Station LLP, and have the pleasure of requesting pre-application advice in connection with two residential design proposals for the redevelopment of the above site.</p> <p>Details of the two proposals (Design Proposal A and Design Proposal B) along with the background to the site are set out below.</p> <p><b>1.0 Site Location and Context</b></p> <p>The site is a former police traffic unit located on the north side of Station Road in Hampton. It comprises a red brick Metropolitan Police Station building, constructed in 1905, fronting onto Station Road and a number of piecemeal 20th century constructions and a garage structure to the rear. The existing building has an 'L' shaped footprint, enclosing a large car park at the front of the site and a large double storey garage at the rear of the site. There are no trees or notable vegetation on site though it is bounded to the north by a large public open park (Beveree Sports Ground) designated as Other Open Land of Townscape Importance. To the west the site is bounded by residential and commercial units and to the east by smaller scale residential cottages along Queen's Bench Cottages. Neighbouring the site to the north east is a large grassed area currently owned by, and used as amenity space for the residential dwelling at 6 Queen's Bench Cottages. Design proposal B would result in this land being included within the redevelopment proposals and No.6 Queen's Bench Cottage being acquired by UK Pacific Hampton Station LLP. The site was found by the Mayor's Office for Policing and Crime (MOPAC) to be surplus to the requirements of the service and was therefore sold off to UK Pacific Hampton Station LLP on 7<sup>th</sup> January 2015 and currently sits vacant. The former Police Traffic Unit is locally listed as a Building of Townscape Merit and is located within the Hampton Village Conservation Area. The immediate area comprises mixed use development, with ground floor commercial uses and residential on the upper floors. The area's character is typified by</p>

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		<p>buildings constructed in a range of styles and designs. There is no prevailing architectural vernacular due to the piecemeal development of the area. The wider context is largely residential in nature though varied in architectural character comprising a mix of semi-detached and terraced properties and flatted developments.</p> <p>The Site has a Public Transport Accessibility Level (PTAL) of 2 and is situated approximately 500m to the east of Hampton train station.</p> <p><b>2.0 Planning History</b> There is no relevant planning history available for the Site online.</p> <p><b>3.0 Designations and Allocations</b> London Borough of Richmond upon Thames (LBRuT) Proposals Map (July 2013) illustrates that the site is subject to the following designations:</p> <ul style="list-style-type: none"> <li>• Area of Mixed Use; and</li> <li>• Hampton Village Conservation Area.</li> </ul> <p>Whilst it does not form part of the development area, regard should be given to the open land to the north of the site, which is subject to the following designations:</p> <ul style="list-style-type: none"> <li>• Other Open Land of Townscape Importance;</li> <li>• Public Open Space; and</li> <li>• Other Site of Nature Importance.</li> </ul> <p>The Site Allocations Plan, upon adoption will form part of the London Borough of Richmond's Development Plan. The pre-publication consultation on new additional sites for this document finished on 21st July 2014 with the projected final publication and submission in winter 2015. Within this document, Hampton Traffic Unit and the associated car park comprise Site Allocation HA 9. The supporting text to this Allocation advocates that, should the premises become surplus [it is considered that this is in reference to the requirements and capacity of MOPAC], the site should be redeveloped for residential use and affordable housing whilst the Building of Townscape Merit on Station Road should be retained.</p> <p><b>4.0 Principle of Land Use</b> Whilst this pre-application submission relates to two emerging design proposals, the principal land use in each of these proposals is the same. It is sought to change the use of the site from Police Traffic Unit (Sui Generis) to wholly residential (C3 Class Use). The site has been in use as a policing facility for the Metropolitan Police since the construction of the front building in 1905. Over the course of the 20th century, the rear elements were extended in a piecemeal manner in order to accommodate varying services and facilities. This saw the construction of a number of rear returns, lean-to structures, a garage building, access ramp and a large car park. In March 2013, following statutory consultation 1, the Police and Crime Plan 2013-2016 2 was published which outlined the Mayor's missions, priorities and objectives for tackling crime in London. As part of this Plan it was noted that, at the time of writing, the Metropolitan Police Service (MPS) had 497 buildings, many of which provided unsuitable facilities to meet the service's operational requirements. In response to this, a MOPAC Estates Strategy 2013-2016 was compiled which outlined an action plan towards creating a more efficient MPS Estate to better and more efficiently meet the operational needs of the 21st century. The Estate Strategy outlined the requirement for MPS assets to be safe, good quality and financially efficient to operate, with assets not meeting these requirements being disposed of as "surplus to requirements". Older properties were a particular focus because they are typically harder to renovate and adapt and expensive to maintain. It was noted in the Police and Crime Plan that the 1 <a href="https://www.london.gov.uk/priorities/policing-crime/police-and-crime-plan">https://www.london.gov.uk/priorities/policing-crime/police-and-crime-plan</a> 2 <a href="https://www.london.gov.uk/sites/default/files/PoliceCrimePlan%202013-16.pdf">https://www.london.gov.uk/sites/default/files/PoliceCrimePlan%202013-16.pdf</a> Estates Strategy makes the provision for a reduction in the footprint of the MPS estate from 900,000 square metres to 600,000</p>

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		<p>square metres, with the disposal of up to 200 buildings. Periodically between 2012 and 2015, applications were made to the Deputy Mayor for Policing and Crime (DMPC) by the MPS to approve “in principle” the disposal of MPS owned properties around London. This disposal programme was designed in such a way to ensure the MPS would meet the revenue savings targets outlined in the Police and Crime Plan. In May 2013 the DMPC approved the “in principle” disposal of the Hampton Traffic Unit with the expectation that its sale would be complete in 2014/2015. However, it was noted that the sale of the unit was dependant on, and only acceptable with, the relocation of its teams to other buildings in the core MPS Estate. In March 2015, the MOPAC disposal schedule for 2014-2015 was published (Appendix 1) which listed those sites that, following being deemed surplus to requirements, were disposed of. This schedule notes that the sale of Hampton Traffic Unit was completed on 7th January 2015 indicating that, in accordance with the requirement of the DMPC, the teams residing in Hampton Traffic Unit had been fully relocated and reprovided elsewhere within the MPS Estate and the site was now redundant. As part of the original marketing of the Hampton Traffic Unit by the MPS, pre-application advice was received on 4th July 2014 from the LBRuT in order to assess the site’s potential for use as residential. The advice received noted that the loss of the police unit would constitute a loss of social infrastructure and, as such, Development Management Plan Policy DM SI2, which resists the loss of such infrastructure had to be considered. This policy stipulates that such community facilities “are often at the heart of local communities” and “contribute to creating a sense of belonging”.</p> <p>Core Strategy Policy CP16 defines community infrastructure as, though not limited to:</p> <ul style="list-style-type: none"> <li>• Public services;</li> <li>• Community Centres;</li> <li>• Public halls;</li> <li>• Arts and cultural facilities;</li> <li>• Policing, fire and ambulance services</li> <li>• Youth centres;</li> <li>• Libraries; and</li> <li>• Places of Worship.</li> </ul> <p>The Hampton Traffic Unit, whilst initially opened in 1905 as a publically accessible Police Station, had changed its form and function over the course of its working life. As noted in the MOPAC disposal schedule for 2014-2015, prior to closure the unit did not have public access or a Front Counter. Further proof of this is located in the Public Access Summary for Richmond (Appendix 2). This document illustrates, following a consultation, the schedule of current and future provisions for Public Access arrangements for policing in the Borough. Public Access facilities describe those policing units that contain the following functions:</p> <ul style="list-style-type: none"> <li>• Front counters;</li> <li>• General contact points for non-urgent enquiries;</li> <li>• Deployment bases where Safer Neighbourhood Teams/Emergency Response and Community Support Officers start and end their tours of duty; and</li> <li>• Safer Neighbourhood Team base occupied when the teams are not out on patrol.</li> </ul> <p>The Public Access Summary for London (Appendix 3) illustrates, at a higher level, current and future public access arrangements city wide. In both the Richmond and London-wide summary, the Hampton Traffic Unit is not noted as a current or future publicly accessible MPS asset. With the above in mind, it is our understanding that, in its presale form, the sole purpose of the unit was to provide storage and maintenance space for classic police vehicles (not operational police vehicles) and back office accommodation. Therefore, it is our view that this does not technically fall under the definition of community infrastructure. However, if the Council</p>

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		<p>considers otherwise then regard should be had to Policy DM SI2. DM SI2 states that the loss of a community facility would be acceptable if evidence can be submitted to demonstrate that:</p> <ol style="list-style-type: none"> <li>1) The existing facilities are no longer needed, do not meet the needs of users and cannot be adapted in any way; or</li> <li>2) The existing facilities are being adequately re-provided in a different way or there are sufficient suitable alternative facilities in the locality; and</li> <li>3) The potential of re-using the existing site for the same or an alternative social infrastructure use has been fully considered.</li> </ol> <p>The Hampton Traffic Unit was considered by the DMPC to be redundant and surplus to requirements due to its inability to contribute towards the objectives of the Police and Crime Plan. It was considered more viable to relocate the services (storage of classic police cars/vehicles) the facility provided to a driving school in Hendon rather than attempt to retain it. As noted above, this facility offered supporting infrastructure to the MPS but did not itself provide a direct public service. Therefore, the relocation of its function and the unit's subsequent disposal would not prejudice any existing community provision. Following the decision to dispose of Hampton Traffic Unit, the Site was marketed by MPS. During this time, it was identified and allocated as a potential new additional residential site to be included within LBRuT's Site Allocations Development Plan Document (DPD). Representations were subsequently made in support of this allocation, submitted on behalf of MOPAC. By way of a summary, MOPAC in their comments confirmed that the services within the Hampton Traffic Unit "will either be re-provided elsewhere or are no longer required following a change in service provision and a rationalisation programme as set out in the MOPAC Police and Crime Plan... The property has now become surplus". It is also worth bearing in mind that all other comments received for this allocation were supportive of the general principle of the site being converted to residential use, with no comments advocating the restoration or retention of the traffic unit use as a community facility. In summary, there is demonstrable evidence to illustrate that the existing facility was no longer needed by the MPS as it failed to meet their needs. Its reprovision elsewhere, as advocated by the DMPC as a condition of its sale, would not adversely impact any existing community provision or call-out response times as the facility itself provided neither public access nor a public contact point. Given the acceptability of the loss of the police use, the residential character of the area and in accordance with the Emerging Site Allocations DPD, it is considered that the site is suitable for a wholly residential development. This is reinforced by the pre-application advice received from LBRuT on 4th July 2014 which noted that, "subject to [the loss of the police traffic unit] being suitable addressed it is likely that residential use is acceptable." It is considered that the loss of the police traffic unit has been comprehensively addressed above.</p> <p><b>5.0 Heritage</b></p> <p>The original police station was constructed in 1905 and, in common with other Metropolitan Police buildings at the time, appears to have been designed by John Dixon Butler. Its design creates a strong identity in line with other police stations of the time that were constructed in line with the Metropolitan Police's suburban expansion. The street façade has largely been retained as constructed with red brick detailing and quoins and white sills and string coursing. As such, it is locally designated as a Building of Townscape Merit, contributing positively to the local streetscape. A Heritage Statement compiled by the Built Heritage Consultancy is enclosed with this submission and explores the heritage value of the site in more detail. It illustrates with maps and aerial images the site's evolution from the early 18th century, as a field and orchard, to the building today. The statement highlights that, as built, the street facing elevation was constructed impressively, with high quality red brick, in order to communicate to passers-by a sense of order and esteem. The flank walls were constructed in a lesser quality red brick, with views from Station Road restricted by the houses at the south of the site next to Station Road. The rear areas entirely obscured from public view were faced in cheap yellow stock brick. The building has since been subject to gradual and piecemeal alterations in order to accommodate changing demands and facilities. Internally, few original features remain whilst the original rear wings have been extended substantially, omitting any of the design or ornamentation present on the principal façade.</p>

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		<p>The site is located within the Hampton Village Conservation Area, which derives its character from its historic village core appearance and tree lined streets. The 1905 John Dixon Butler designed frontage contributes positively to the Conservation Area and has a visually significant role in the streetscape. It is for this reason that it has been designated a Building of Townscape Merit. The flank and rear areas however, as noted above and in the accompanying Heritage Statement, make a neutral contribution to the Conservation Area. The attached parking garage, car park and front wall however contribute negatively to the Conservation Area whilst also adversely impacting upon the appearance of the original 1905 façade. The supporting paragraph for the Hampton Traffic Unit, noted in the Emerging Site Allocations DPD, states the requirement that, in any redevelopment, “the Building of Townscape Merit on the Station [Road] frontage be retained.” This also reinforces the fact that the building’s heritage value is derived almost entirely from its ornate principal façade. The enclosed request for pre-application advice is in connection with two emerging design proposals (Design Proposal A and Design Proposal B) on the Hampton Traffic Unit site. Both seek to convert the original 1905 building for use as residential whilst retaining and enhancing its historic principal façade, maximising its positive contribution to the streetscape. In both proposals, the piecemeal rear additions and alterations, the unsightly car garage and the parking area will be removed in favour of a single cohesive high quality residential development which compliments the retained frontage of the Building of Townscape Merit and works positively to protect and enhance the character of the Hampton Village Conservation Area.</p> <p><b>6.0 Contamination</b>  LCM Environmental carried out a Phase 1 and 2 Site Investigation to assess the likelihood of the soil beneath the Hampton Traffic Unit being contaminated from previous activities that had taken place both on site and off site. Investigation revealed no off site sources of contamination. Buried beneath the site however are five disused tanks which, when the police traffic unit was operational, would have stored fuel. Intrusive investigations by LCM revealed that towards the rear of the site around two of the smaller fuel storage tanks, ground contamination existed. It is considered that this contamination resulted from the tanks leaking over time. As such, as part of any proposal to redevelopment the site for residential, full remediation would take place. As would be noted in the Contamination Report that would be submitted with any future application, this remediation would likely comprise the full removal of these five underground tanks and a minimum area of 30 square metres. For clarity, included is a summary sheet from LCM Environmental which outlines the contamination issues on the site.</p> <p><b>7.0 Ecology</b>  An Ecology Assessment and a Landscape Report (including Tree Survey) would be carried out and submitted with any forthcoming planning application. RSK Environmental Ltd have undertaken an initial Phase 1 Habitat Survey and noted that habitats on the site consisted of buildings, hard standing, scattered scrub, grassland and scattered trees. The habitats are deemed to be of little ecological value, and there is no evidence of protected species such as Badgers. In terms of bats, an initial internal and external survey of the buildings on the site has shown no evidence of features suitable for roosting bats. However, a bat emergence study is due to be undertaken and the results will be included within the Ecology Assessment submitted with the Planning Application.</p> <p><b>8.0 Sustainability</b>  A Sustainability and Energy Report will be submitted with the Planning Application. Whilst energy consultants have yet to assess the energy performance of the Building of Townscape Merit and identify a preferred energy strategy, we will be seeking to ensure that the lean, clean and green principles as set out in Policy 5.2 in the London Plan (2015) are applied and that carbon dioxide emissions are reduced in accordance with Development Management Plan Policy DMSD1. With regards to water consumption the development will be designed so that mains water consumption is less than 105 litres per day per head.</p> <p><b>9.0 Design Proposal A</b>  <u>Residential Provision and Mix;</u>  The proposed scheme would provide a good mix of unit sizes in order to provide for and meet a range of housing needs. This mix is</p>

Ref. no.	Name / Organisation	Detailed comment										
		<p>illustrated in Table 1.</p> <table border="1" data-bbox="555 236 1323 300"> <thead> <tr> <th data-bbox="555 236 705 268">Size</th> <th data-bbox="705 236 860 268">1b/2p</th> <th data-bbox="860 236 1014 268">2b/3p</th> <th data-bbox="1014 236 1169 268">2b/4p</th> <th data-bbox="1169 236 1323 268">3b/6p</th> </tr> </thead> <tbody> <tr> <td data-bbox="555 268 705 300">No.</td> <td data-bbox="705 268 860 300">4</td> <td data-bbox="860 268 1014 300">6</td> <td data-bbox="1014 268 1169 300">12</td> <td data-bbox="1169 268 1323 300">8</td> </tr> </tbody> </table> <p><b>Table 1: Residential dwelling mix</b></p> <p>In total, the development would provide 30 residential units, 13% of which would constitute smaller dwellings (1 bed units). Whilst the site is located in an “Area of Mixed Use”, Hampton is not considered by policy to be a “Town Centre”. As such, this provision and mix is in considered to be appropriate given the location of the site and accord with both Development Management Policy DM HO4 and Core Strategy Policy CP 14. Policy further requires any proposed residential developments that are to be located in already established residential areas to be of a mix and scale that is in keeping with the existing character. Station Road and the wider Hampton Village Conservation Area, by their very nature comprise residential dwellings of a mix of sizes, scales and styles. As such, the dwelling mix proposed with this design proposal is in accordance with policy.</p> <p><u>Residential Density;</u></p> <p>In accordance with the guidance provided by the London Plan, Hampton Traffic Unit is located in an area that is considered “urban”. In accordance with the London Plan’s definition, the locality comprises a mix of uses, terrace houses, medium building footprints and properties ranging in height from two to four storeys. The site has a PTAL of 2 and comprises a development of 30 residential units. These units are generally mixed in size, ranging from smaller 1 bed dwellings up to the larger 3 bed family homes - with an average provision of 3.1 habitable rooms per unit. With the nature of the development in mind and in accordance with the London Plan’s density matrix, an acceptable density for the site should therefore fall within the range of 55 – 145 units per hectare. The size of the site is circa 0.25 hectares which provides a residential density of 120 units per hectare. It is therefore considered that the proposed density is wholly appropriate and compliant with the Development Plan.</p> <p><u>Affordable Housing;</u></p> <p>Core Strategy Policy CP15 aims for a 50% on-site affordable housing provision in developments comprising 10 or more units. This percentage is subject to viability, the mix of uses and other planning benefits, where developers should otherwise seek to provide the maximum achievable affordable housing provision. A Viability Assessment will be submitted with any future application which would robustly demonstrate and support the affordable housing provision in this scheme. The Assessment would have particular regard to the following points:</p> <ul style="list-style-type: none"> <li>• The site contains a Building of Townscape Merit, which will be retained. This naturally restricts the scope and extent of any future development and would therefore have an impact on viability;</li> <li>• The site towards the rear is contaminated which would require costly mitigation works. Extensive groundworks will be required on those areas of the site not currently understood to be contaminated in order to carry out further investigations on ground quality;</li> <li>• The site redevelopment would require extensive clearance works to remove the car park, concrete access ramp and car garage ready for building.</li> </ul> <p><u>Design and Scale;</u></p> <p>Policy stipulates that new development must be of the highest architectural design quality in terms of layout, materials and massing, should provide the highest quality of living to future occupants and must be compatible with local character. Pre application advice received on 4th July 2014 considered redevelopment of the Hampton Traffic Unit site to constitute infill development. Development Management Policy DM HO2 is therefore relevant, which further reinforces the view that any such scheme must reflect its local context and protect the amenity of existing neighbours. The design proposed is a part 1 / part 3 storey perimeter style residential development that has been sensitively designed to complement the surrounding streetscape. A key</p>	Size	1b/2p	2b/3p	2b/4p	3b/6p	No.	4	6	12	8
Size	1b/2p	2b/3p	2b/4p	3b/6p								
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		<p>consideration in the design was to fill the visual void that the Traffic Unit had created in the street scene. This has been achieved through the creation of a high quality Station Road frontage that would restore the original Station Road building line, visually connecting the 1905 historic. Police Station frontage to the three storey townhouses to the east, and providing a better sense of enclosure to the street. In order to further reinforce this building line and in keeping with the character of Hampton Village Conservation Area, street trees would be planted alongside this frontage. With the exception of those units directly fronting Station Road, all will be accessed primarily from a generous landscaped communal courtyard. This courtyard would provide an element of semi-public space that would enhance the community cohesion within the development. Underground parking would be provided, accessed through a discrete entrance from Station Road, this ensures that there is a sufficient parking provision for residents and removes cars from the street. It is recognized that, whilst the character of the surrounding townscape is defined by buildings varying in height and design, the proposed 3 storey development would create a visually cohesive street scene along Station Road, which is currently interrupted by the existing Traffic Unit. It is recognized that much of the character of the area is derived from the varied architectural vernacular and differing styles of construction. The rationale behind the materiality for this proposal was therefore, rather than providing a pastiche design, to instead produce a modern interpretation of an established, historic building style. The scheme would therefore be constructed primarily from brick, the prevailing material in use in the area. There is a prominence of high pitched and mansard roofs in the locality so this has further been replicated in the proposed development through the creation of a second floor, zinc clad mansard roof.</p> <p>On the Station Road frontage, windows and doors on the lower floors would be framed with projecting architraves and lintels whilst windows in the mansard roof would take the form of dormers, set back behind the raised parapets. All openings would be of a size and scale not incongruous with the street scene, reflecting and complimenting the retained façade of the former police station as a Building of Townscape Merit. To the rear of the former police station façade, the rear wings, which have previously been noted to be of much lower value, would be removed in order to allow for a greater degree of flexibility and design quality on the site. With this in mind, in the courtyard area away from view of Station Road, the scheme takes on a more unique appearance, with taller more modern windows on the lower levels and dormer windows with Juliet balconies on the mansard roof that splay upwards providing visual interest to the upper levels. Along the first floor levels, all dwellings have front balconies looking over the communal area. These connect up visually, encircling the courtyard area and reinforcing the development's sense of enclosure. At present a large garage dominates the northern edge of the site and restricts views of the Beveree Sport Ground. The design proposals would make an efficient use of brownfield land, whilst enabling glimpses of the trees behind by separating the house at the northern end of the proposed courtyard from the adjoining houses above the ground floor level. It is considered that this design helps to improve the sense of openness and visual connections with the surrounding open space. In terms of the usability of the residential dwellings PRP architects are seeking to ensure all internal spaces, layouts and access points comply with the Mayor's Housing Standards Policy Transition Statement and Building Regulation M4, with 90% of units complying with Regulation M4(2) for accessible and adaptable dwellings, and 10% complying with Regulation M4(3) for wheelchair user dwellings. In all, it is considered that the proposed development has been designed to the highest quality, complementing the retained Building of Townscape Merit and providing a positive addition on the Hampton Village Conservation area.</p> <p><u>Amenity:</u> Core Strategy Policy CP14, and Development Management Policies DM HO2 and DM DC5 stipulate that any new development within the streetscape must protect adjoining properties from unreasonable loss of privacy, light, noise and disturbance. The site, as noted by the pre-application advice received from LBRuT on 4th July 2014, constitutes infill development due to its location in an already established largely residential and mixed use area. In accordance with this, the design of this proposal has been sensitively devised to ensure that any potential adverse impacts on the quality of life of neighbouring residents is minimised.</p>

Ref. no.	Name / Organisation	Detailed comment
		<p>In terms of overlooking and impacts on privacy, to the west of the site it is understood the land is largely in commercial use. However, to ensure that any future development would not be prejudiced, the units along the western boundary would have no windows overlooking this site.</p> <p>With the exception of the residential units on the upper floors on the opposite side of Station Road, the single storey Queen's Bench Cottages located to the east are the closest residential dwellings to the site. Whilst the dwellings proposed in this scheme would have windows on the east elevations facing these cottages, it is considered that their separation distance of 16m to 17m, combined with the presence of an existing heavy line of trees and vegetation, would eliminate any possible impingement of the Cottages' privacy. In order to further retain the privacy of Queen's Bench cottages, those dwellings along the eastern edge within their closest proximity would not have roof terraces or east facing balconies, instead being provided with rear gardens and west facing balconies that look over the central communal courtyard. To the north of the site is the Beveree Public Park. The existing heavy tree line between the site and this park would be protected and enhanced to ensure the private nature of the open space is maintained, whilst the proposed design would help to improve the sense of natural surveillance and safety for users of the park. In terms of impacts on daylight and sunlight, a BRE Daylight and Sunlight Assessment would be submitted with a future application which would illustrate that, internally, the proposed scheme would receive a high quality level and also that the scheme itself would not adversely impact upon the light levels received by Queen's Bench Cottages. As the proposed development is entirely residential in nature, there would be no amenity impacts associated with noise or pollution.</p> <p><u>Outdoor Open Space:</u></p> <p>Core Strategy Policy CP14 and Development Management Policies DM HO4 and DM DC 6 state the requirement for all residential developments to be provided with an adequate degree of high quality, useable and fully accessible amenity space. As such, under this proposal the vast majority of units would have outdoor private space in the form of rear gardens, roof terraces and/or balconies. In terms of communal space provision, the landscaped central courtyard area would be circa 500sqm and sensitively designed to include doorstep play provision for children under 5 years old. Natural play features would be integrated into the design of the courtyard thereby encouraging imaginative and diverse play for younger children. In addition to the on-site communal space provision, the site is only a short walk away from both the adjacent Beveree sports ground, which provides large grassed areas for informal play, and the Hampton Village Green, which provides play facilities for children under 7 and for children between the ages of 7 - 13. The site is also located within close proximity to the River Thames and its associated amenity spaces. In all it is considered that the outdoor open space provision proposed in this development is sufficient and would provide future residents with a high quality of living.</p> <p><u>Transport and Parking:</u></p> <p>The site of the Traffic Unit has a low PTAL of 2. The pre-application advice received from the Council on 4th July 2014 highlights that local on-street parking is at saturation level and therefore the parking provision must meet the standards outlined in Core Strategy Policy CP5 and in Development Management Policies DM TP2 and DM TP8. In accordance with policy, this design proposal has been devised to maximise the provision of car parking on site (35 car parking spaces) without adversely impacting on dwelling numbers and unduly underproviding below the London Plan's recommended level. All parking would be confined to an underground area so as to remove cars from the street and retain the development's open ambience. In terms of cycle parking provision, the London Plan (2015) stipulates that units comprising 1 beds should be provided with 1 cycle space and units with 2+ beds should be provided with 2 cycle spaces. The total cycle storage capacity of this 30 unit development, given its dwelling mix, is 56 spaces. This is therefore policy compliant. Given the constraints of the site in terms of the requirement to retain the Building of Townscape Merit and also given its very close proximity, within only a short walk, to Hampton Station it is considered that the parking provision proposed in this scheme is sufficient in order to allow for the residential use of the site to be optimised within its</p>

Ref. no.	Name / Organisation	Detailed comment														
		<p>context, in accordance with policy.</p> <p><b>10.0 Design Proposal B</b></p> <p>This proposal is the same as Design Proposal A, apart from in the following respects:</p> <p><u>Residential Provision and Mix;</u></p> <p>The proposed scheme would provide a good mix of unit sizes in order to provide for and meet the greatest need. This mix is illustrated in Table 2.</p> <table border="1" data-bbox="555 392 1632 456"> <thead> <tr> <th data-bbox="555 392 707 424">Size</th> <th data-bbox="707 392 860 424">1b/2p</th> <th data-bbox="860 392 1012 424">2b/3p</th> <th data-bbox="1012 392 1164 424">2b/4p</th> <th data-bbox="1164 392 1317 424">3b/5p</th> <th data-bbox="1317 392 1469 424">3b/6p</th> <th data-bbox="1469 392 1632 424">4b/8p</th> </tr> </thead> <tbody> <tr> <th data-bbox="555 424 707 456">No.</th> <td data-bbox="707 424 860 456">4</td> <td data-bbox="860 424 1012 456">5</td> <td data-bbox="1012 424 1164 456">10</td> <td data-bbox="1164 424 1317 456">1</td> <td data-bbox="1317 424 1469 456">5</td> <td data-bbox="1469 424 1632 456">6</td> </tr> </tbody> </table> <p><b>Table 2:</b> Residential dwelling mix</p> <p>In total, the development would provide 31 residential units, 13% of which would constitute smaller dwellings (1 bed units). As noted previously, Hampton is not a designated Town Centre. This provision and mix is therefore in accordance with policy which, outside town centres, has a preference for the provision of larger family dwellings though, on appropriate sites, would also support the provision of smaller units that can better cater for single person households. Design Proposal B provides a higher proportion of larger family dwellings than Design Proposal A due to the increased site area. Whilst there is a higher provision of larger dwellings proposed here, it is considered the general mix is in keeping with the existing residential provision along Station Road and within the wider Hampton Village Conservation Area, which, by their very nature comprise residential dwellings of a mix of sizes, scales and styles.</p> <p><u>Residential Density:</u></p> <p>Whilst the proposed development has 31 residential units in a mix of sizes, there is a higher proportion of larger family dwellings. As such, the general residential provision is 3.5 habitable rooms per unit. With the nature of the development in mind and in accordance with the London Plan's density matrix, an acceptable density for the site should therefore fall within the range of 45 – 120 units per hectare. The size of the site is 0.32ha which provides a residential density of 97 units per hectare. It is therefore considered that the proposed density is appropriate.</p> <p><u>Affordable Housing:</u></p> <p>See the provision for Design Proposal A.</p> <p><u>Design and Scale:</u></p> <p>With the exception of those units directly fronting Station Road, all will be accessed from the landscaped communal courtyard and road that would pass up through the site, which themselves would provide an element of semi-public space. Whilst the majority of the houses would be focussed around the central courtyard, three dwellings would be located on the access road which turns towards the north east of the site. Like the courtyard, this road would be landscaped and looked over from these houses. Six of the residential units provided would have integrated garages and underground parking would further be provided, accessed through a discrete entrance from Station Road. As with Design Proposal A, a modern yet reserved rationale has informed the design on the Station Road frontage, in order to reflect and complement the retained façade of the former police station as a Building of Townscape Merit. To the rear however, with the removal of the former police station's rear wings, a more modern and flexible design would be adopted and the additional land in the north east corner of the site would enable six, four storey family townhouses to be provided along the northern edge of the Site. The 4 storey element would broadly be the same height as the police station and as with Design Proposal A, the massing has been broken down to enable glimpse views of the trees behind by separating the proposed houses from each other above the ground floor level. It is considered that this design helps to improve the sense of openness and visual connections with the surrounding open space. In all, it is considered that the proposed development has been designed to the highest quality, complementing the retained façade of the Building of Townscape Merit and providing a positive</p>	Size	1b/2p	2b/3p	2b/4p	3b/5p	3b/6p	4b/8p	No.	4	5	10	1	5	6
Size	1b/2p	2b/3p	2b/4p	3b/5p	3b/6p	4b/8p										
No.	4	5	10	1	5	6										

Ref. no.	Name / Organisation	Detailed comment
		<p>addition to the Hampton Village Conservation area.</p> <p><u>Amenity:</u> To the north of the site is the Beveree Public Park. The existing heavy tree line between the site and this park would be protected and enhanced to ensure the private nature of the open space is maintained, whilst the proposed design would help to improve the sense of natural surveillance and safety for users of the park.</p> <p><u>Outdoor Open Space:</u> See the provision for Design Proposal A.</p> <p><u>Transport and Parking:</u> Parking would be provided in the form of an underground area and, for six of the larger houses along the northern edge, integral garages. This will circumvent the issues associated with cars being parked on the street and would ensure that there is a sufficient parking provision (39 car parking spaces at basement level and 12 at ground floor) for residents. In terms of cycle parking provision, London Plan (2015) policy stipulates that units comprising 1 beds should be provided with 1 cycle space and units with 2+ beds should be provided with 2 cycle spaces. The total cycle storage capacity of this 31 unit development, given its dwellings mix, is 58 spaces. This is therefore policy compliant.</p> <p><b>11.0 Consultation</b> Following the pre-application process to engage with Council Officers, local residents and amenity groups, it is proposed to engage with Local Councillors. We would welcome further clarification as to whether LBRuT has any formal procedures or mechanisms regarding this.</p> <p><b>12.0 Submitted Material</b> In accordance with the above, please find enclosed the following:</p> <ul style="list-style-type: none"> <li>• Architectural Drawings;</li> <li>• Design Statement;</li> <li>• Heritage Statement;</li> <li>• Pre-Application Transport Statement; and</li> <li>• Contamination Summary Sheet.</li> </ul> <p><i>See the Appendix (11) to this document for the Mayor of London, Office for Policing and Crime, Disposal of Buildings</i></p>
75.	NHS England , NHS Property Services, Healthy Urban Development Unit (HUDU) and Richmond CCG	<ul style="list-style-type: none"> <li>• As part of the Local Plan Review we welcome the opportunity to work closely with the Council to ensure that future health service and premises requirements are identified and policies and allocations support CCG commissioning and estate strategies and proposals for investment and disinvestment; furthermore, we welcome the opportunity to continue to work with LBRuT in identifying any proposed developments that may have an impact on Primary Care capacity. There is a need for purpose built properties that deliver the provision of integrated primary and community healthcare services through the joint Outcome's Based Commissioning programme. We welcome the opportunity to update the Local Plan evidence of health needs and estate requirements and review the infrastructure delivery schedule and CIL Regulation 123 List to ensure it reflects and supports the CCG strategies. In particular policies should support the aim to improve access to primary care, which in some cases will involve extending GP surgery opening hours, and should support the re-use of social infrastructure and the co-location of services.</li> <li>• We welcome the intention to update the Core Strategy policy on Health and Wellbeing (CP17) to recognise the role of planning to improve health, prevent ill-health and reduce health inequalities, including a new policy approach to restrict concentration and location of hot food takeaways. We support the requirement for Health Impact Assessment for major development proposals</li> </ul>

Ref. no.	Name / Organisation	Detailed comment
		<p>which should address the impact on healthcare services and wider health and wellbeing issues. We welcome the specific consideration given to the needs of older people, including the creation of dementia-friendly environments and would support a future supplementary planning document on Healthy Communities to reflect the updated policy.</p> <ul style="list-style-type: none"> <li>• There is no mention of Richmond Royal Hospital site. South West London and St Georges Mental Health NHS Trust declared most of the Richmond Royal site surplus in December 2015. Plans for Richmond Royal and Barnes Hospital are part of the Trust's estate modernisation programme.</li> <li>• Stag Brewery and Ham Close- we are keen to ensure early and full involvement of health organisations, including Hounslow and Richmond Community Healthcare Trust in planning around these developments. Any potential population increases will impact on the capacity of health services and future planning arrangements. In particular, there is the need for coordinated approach to development and healthcare requirements in Ham.</li> </ul>
76.	James Togher, Environment Agency	<p>Thank you for consulting the Environment Agency. We feel the key strategic environmental issues and opportunities relate to:</p> <p><b>Managing flood risk and climate change across Richmond</b> - It's essential the new local plan policies and site allocations help to deliver resilience to a changing climate. New and existing infrastructure across the borough such as bridges, roads, railways and electricity sub stations should be carefully designed, located and maintained to remain safe and operational during a major flood event or drought. Managing flood risk requires a sequential approach and new development should be directed towards the lowest flood risk areas. This approach is to avoid, compensate and finally mitigate flood risk. We understand town centres such as Richmond and Twickenham are located in high risk flood risk areas. The local plan offers opportunities for regeneration of the town centres and riverside sites to contribute towards managing flood risk through resilient design and retrofitting e.g. raised floor levels, building resilience and educating residents and businesses on preparing and managing flood risk.</p> <p>Richmond is a unique borough which regularly experiences high tides across the riverside areas in Richmond and Twickenham and remains operational and resilient, this could be shared with other councils to demonstrate "making space for water" approach and how residents and visitors are living with high tide events.</p> <p><b>Improving and protecting Richmonds unique environment</b> - with a rich mixture of riverside environments and open parkland Richmond has high environmental standards which contrasts with high carbon footprint and pollution issues. The new local plan offers an opportunity for a renewed focus to enable residents and visitors to reduce their environmental impact e.g. through reducing pollution, retro fitting, energy efficiency, hydro power and waste reduction initiatives.</p> <p>The local plan should build on good practice relating to improving rivers and successes delivered through partnership working for example with the Crane Valley Partnership and Friends of River Crane (Force) Thames 21 and ensure revised local plan policies and site allocations continue to deliver an improved rivers across the borough. The Beverley Brook Catchment Partnership is also delivering important environmental improvements in Richmond Park.</p> <p><b>Proposed site allocations</b> - we have assessed the proposed site allocations for the flood zone and riverside environment and provided comments on each site allocation in Section 2 and a constraints map attached. As you are aware it is essential the new local plan policies and site allocations are based on the latest environmental evidence and good practice. For the latest data sets visit Datashare <a href="http://www.geostore.com/environment-agency/">http://www.geostore.com/environment-agency/</a></p> <p><b>Sustainability Appraisal Scoping report</b> – feedback provided in Section 3 attached.</p> <p>By using the latest environmental and flood risk evidence to inform planning policies and site allocation you will ensure delivery of the right development in the right place. Flooding will remain a major issue but it is also an opportunity to combine positive spatial planning, infrastructure planning and emergency planning to ensure residents, business and visitors remain safe and resilient to extreme weather events.</p> <p><b>Section 1 - Detailed feedback</b></p>

Ref. no.	Name / Organisation	Detailed comment
		<p><b>Managing flood risk and climate change</b></p> <p>We welcome the reference to the Environment Agency's River Thames Scheme and TE2100 strategies and Drain London. (4.1.3) and support updating the Strategic Flood Risk Assessment (SFRA) (to be published early 2016). We also recommend keeping the SFRA up to date and referring to any reports and lessons learned from the recent flooding across Yorkshire, Cumbria and Lancashire. Its essential infrastructure (new and existing) is resilient to a changing climate and extreme events such as flooding and drought. This includes infrastructure such as roads, bridges, railways and electricity sub stations etc. Local planning policies should also encourage retrofitting and resilience to flood risk.</p> <p>NPPF Paragraph 100 states:  <i>Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies</i></p> <p>National climate change allowances are currently being updated so the local plan policies and SFRA should be reviewed to incorporate the latest evidence. The Flood risk climate change allowances are being revised to reflect the latest climate projections in UKCP09 and wider flood risk research published since 2009. This is due to be published in Spring 2016 and will replace previous climate change allowances. Land use planning decisions should be based on the latest and most accurate climate change data and evidence. <a href="https://www.gov.uk/government/publications/flood-and-coastal-risk-guidance-climate-change-allowances">https://www.gov.uk/government/publications/flood-and-coastal-risk-guidance-climate-change-allowances</a></p> <p>Please also refer to the attached the TE2100 briefing for Richmond this shows key issues and opportunities for your borough as:</p> <ul style="list-style-type: none"> <li>• Raising existing flood defences to the required TE2100 Plan levels in preparation for future climate change impacts or demonstrate how tidal flood defences protecting sites can be raised to the required TE2100 levels in the future through submission of plans and cross-sections of the proposed raising;</li> <li>• Demonstrating the provision of improved access to existing flood defences and safeguarding land for future flood defence raising and landscape, amenity and habitat improvements;</li> <li>• Maintaining, enhancing or replacing flood defences to provide adequate protection for the lifetime of development;</li> <li>• Where opportunities exist, re-aligning or setting back flood defence walls and improving the river frontage to provide amenity space, habitat, access and environmental enhancements.</li> <li>• Securing financial contributions towards the anticipated costs of flood risk management infrastructure required to protect the proposed development over its lifetime. The TE2100 briefing shows the approximate costs of maintaining and improving the flood defence system for the London Borough of Richmond are as follows for the period to 2050: <ul style="list-style-type: none"> <li>• Flood defences - maintenance and repair: £25 million</li> <li>• Flood defences - major repairs and replacements: £145 million</li> <li>• Thames barrier (contribution): £100 million</li> </ul> </li> </ul> <p>Thus the overall cost of the flood defence system for Richmond for the period to 2050 is about £270 million. The date 2050 was selected at it is before the major improvement to the flood defence system is likely to be carried out. The tidal flood defences in this area are covered by the 'Thames River (Prevention of Floods) Acts 1879 to 1962'. This places liability for maintenance and ultimate replacement of tidal flood defences on the Riparian Owner (freeholder of the land under or adjacent to the tidal defence). The council should be aware of these costs because contributions may be needed where the council is the Riparian owner, a Riparian Owner cannot be found, or the Riparian Owner is unable to finance works. The local plan process can be used to identify potential areas for "making space for water" and how riverside areas could be adapted for rising tides and reduced use of the Thames Barrier in line with the TE2100 plan actions. Photograph below shows riverside area near Richmond Lock experiencing high tides during February 2015. (Photo credit: Environment Agency) Often drivers park cars alongside the river ignoring signs showing the area is</p>

Ref. no.	Name / Organisation	Detailed comment
		<p>subject to tidal flooding so the SFRA/local plan should consider areas at highest risk from high tides and solutions to this for example road barriers / parking removal during high tides or creating new riverside terracing and riverside parks to manage risks to life and property from a changing climate. Other opportunities for set back defences may exist around Kew and Barnes riverside areas. We are also keen to see further exploration of the benefits of restoration of Ham Lands to natural floodplain. This could support the aims and objectives of the River Thames Scheme as well as providing multiple community and wildlife benefits. Maybe these improvements to riverside areas could be integrated with improvements to the riverside and Thames path and funded using Community Infrastructure Levy 123 list for "Strategic parks and open spaces projects - Improvements to the River Thames Towpath" and linked to the proposed Green Infrastructure local plan policy. For more information on restoring lost flood plains and delivering set back flood defences and tidal terracing refer to the Estuary Edges guidance below. We recommend including this link in the national guidance on Flood Section of the <a href="http://www.ecrr.org/Portals/27/Publications/Estuary%20Edges%20-%20design%20advice.pdf">http://www.ecrr.org/Portals/27/Publications/Estuary%20Edges%20-%20design%20advice.pdf</a></p> <p><a href="http://thames-landscape-strategy.org.uk/wp-content/uploads/2014/02/Restoration-of-the-Lost-Floodplain-final-document.pdf">http://thames-landscape-strategy.org.uk/wp-content/uploads/2014/02/Restoration-of-the-Lost-Floodplain-final-document.pdf</a></p> <p>An example of tidal terracing and set back flood defences is shown below from Greenwich Peninsula.</p> <p>TE2100 and the River Thames Scheme should be referenced within the Climate Change Adaptation Policy CP3. It should also be referenced within policy DMSD8 Flood Defences. The Thames Landscape Strategy has a lot to offer in terms of vision and project ideas which would help support the Local Plan. The SFRA / local plan should also encourage communities to prepare for flooding, for example through producing Flood Plans and signing up for flood warning to be prepared and ready for major flooding events. <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/292939/LIT_5286_b9ff43.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/292939/LIT_5286_b9ff43.pdf</a></p> <p>Site allocations and planning decisions should follow the sequential test and steer new development towards the areas of lowest flood risk where possible using the latest flood risk and climate change evidence. Please refer to Section 2 for feedback on the proposed site allocations.</p> <p><b>Environmental protection and enhancement</b></p> <p>We support the proposal to produce a Supplementary Planning Document (4.1.5) on Environmental quality and improvement. This is an excellent opportunity to develop a strategic vision for the river corridors across Richmond. Given the extensive miles of rivers across the borough Richmond upon Thames and the impacts of climate change the SPD could focus on the river corridors and ways to protect and enhance them for example the Crane, Thames, Beverley Brook and Duke of Northumberland river. Opportunities exist to work with the Crane Valley Partnership to develop a plan to deliver an ambitious programme of river restoration along the River Crane downstream of Mereway Road, where extensive open spaces (e.g. Twickenham Rough and Moorhead Park; Cole Park) offer potential for a much enhanced river and riverside environment with multiple benefits for the community through improved access, health and education. Improving the rivers in line with is in line with NPPF paragraph 109 on how the planning system should contribute to and enhance the natural and local environment by</p> <p><i>‘preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability’</i> We have worked in partnership with the London Borough of Lewisham which also has a number of river corridors to produce a River Corridor Improvement Plan SPD which is available to view on their website: <a href="http://www.lewisham.gov.uk/myservices/planning/policy/LDF/SPDs/Pages/River-corridor-improvement-plan.aspx">http://www.lewisham.gov.uk/myservices/planning/policy/LDF/SPDs/Pages/River-corridor-improvement-plan.aspx</a> We understand the need to consolidate and streamline the policies relating to the River Thames and River Crane whilst retaining existing policy approaches. (4.5.7). We understand the importance of increasing/improving access whilst at the same time protecting and enhancing the rivers' biodiversity, this could be addressed through the Environmental SPD. Policies relating to rivers should also refer to the need to protect and improve the tidal flood defences. Often the tidal flood defences across the borough are set back from the rivers edge in gardens so it is essential even minor development does not damage the flood</p>

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		<p>defence structures. We support the need to clearly set out the requirements for a public footpath alongside the River Thames and to manage expectations in terms of residential moorings. Often moorings can cause local environmental and social issues and if not carefully designed and located can cause major flood risk issues such as coming loose from moorings and damaging bridges during major flood events. 4.5.7 Should be updated to reference Beverley Brook as well as the Crane and Thames</p> <p>The Water Framework Directive (WFD) seeks to improve water quality in all our waterbodies (including lakes, rivers and estuaries). It sets a target for all waterbodies to achieve “good ecological status” by 2027; we also have to prevent the deterioration of waterbodies and seek enhancements where rivers, lakes and estuaries are not achieving good ecological status or potential. The planning system offers significant opportunities to help deliver this.</p> <p>The latest Ecological status of rivers within Richmond upon Thames are shown below and briefing attached on the River Crane catchment and key actions to improve the water environment.</p> <p><b>Improving and protecting Richmond’s unique environment</b></p> <p>There are many areas of opportunity for ecological improvement along the Beverley Brook in London Borough of Richmond upon Thames.</p> <p><b>Richmond Park</b> - This is a fantastic asset and important habitat for wildlife. The Beverley Brook, which flows through Richmond park is currently in a poor state and lacks the aquatic habitats needed to support good biodiversity.</p> <p>A project in 2015 by the South East Rivers Trust to improve the habitats in Richmond Park has been successfully completed working on 650 metres of the river. More work on the river to improve habitats will be needed to improve the river in Richmond Park and satisfy the Water Framework Directive (WFD) requirements. The work already done has also begun to self clean the bed of the river reducing the amount of silt built up, which could also have flood risk benefits. Similar work downstream could improve the situation further, where silt builds up through the Barnes area is an issue.</p> <p><b>Palewell common</b> - This park is well used for recreation, but the river has been re-aligned and confined to the edge of the park, essentially out of sight, out of mind. Improvements could be made to the river which improves the habitat for aquatic wildlife as well as reconnecting people to the river, turning it from a nuisance to an asset.</p> <p><b>Vine Road Recreation ground</b> - This park provides excellent opportunities to improve river habitats, amenity and potentially, flood storage. The Beverley Brook, which, like Palewell common, has been confined to the edge of the park could be improved by realigning or creating a bypass channel. This could improve the habitat, create an attractive amenity and has the potential to provide a small amount of flood storage. The Friends of Barnes common have shown an interest in this proposal.</p> <p>Similar projects include Chinbrook meadows and Ladywell fields in the London Borough of Lewisham, for more information on the schemes see the links below:</p> <p><a href="http://www.lewisham.gov.uk/inmyarea/openspaces/parks/Pages/chinbrook-meadows.aspx">http://www.lewisham.gov.uk/inmyarea/openspaces/parks/Pages/chinbrook-meadows.aspx</a></p> <p><a href="http://www.lewisham.gov.uk/inmyarea/openspaces/parks/Pages/ladywell-fields.aspx">http://www.lewisham.gov.uk/inmyarea/openspaces/parks/Pages/ladywell-fields.aspx</a></p> <p>Improvements to the river channel through Barnes could be designed to reduce the build up of silt which would benefit flood resilience as well as improving the environment for wildlife and reducing midges which thrive in silty conditions. 2015 WFD Status of the Beverley Brook – Moderate (potential). Issues which need to be addressed – Phosphate from Sewage Treatment works and mis-connected properties. Mitigation measures- a List of improvements to habitat and morphological regime of the river. Road and urban runoff if also a big contributor to pollution in the river. For more information on misconnections click below:</p> <p><a href="http://www.connectright.org.uk/">http://www.connectright.org.uk/</a> The Water Framework Directive objectives is for all rivers to be at Good status or potential by 2027.</p> <p><b>Green Infrastructure</b></p> <p>We support the introduction of a new policy regarding Green Infrastructure (GI) (4.5.1), which could include a map of all current GI and future opportunities for GI and ways to improve linkages across Richmond and with neighbouring boroughs for example</p>

Ref. no.	Name / Organisation	Detailed comment
		<p>improving the Thames Path linkages and other river corridors. This policy should reflect upon all of the benefits of GI, both social and environmental and when carefully designed can deliver multiple benefits. It should ensure all development retains and reinforces green spaces and where possible creates links within and to the GI network. This policy could be incorporated with DM OS 6 (Public Open Space).</p> <p><b>Biodiversity</b></p> <p>We would not be against consolidating CP4 (Biodiversity) and DM OS 5 (Biodiversity and new development) provided it can be differentiated as to how biodiversity will be protected within designated sites and how it will be protected within the wider environment (referencing the GI policy). CP4 should define what this policy refers to, gathering information from the Environmental Records Centre (Greenspace Information for Greater London): Sites of national or international importance (SAC, SPA, NNR, SSSI) Sites of local importance (SNCI/LWS, LNR, Ancient Woodland, UK BAP Priority habitats) Legally protected species, UK BAP Priority species and species defined by S41 of the NERC Act (2006) There could also be more emphasis on how biodiversity will be protected and enhanced within the planning process, e.g. by not permitting development that affects sites and species of international and national importance and requiring ecological reports to be submitted alongside proposals to demonstrate how impacts on a designated site/habitat/species can be mitigated/compensated for to achieve an overall net gain in biodiversity. In addition, protecting, managing and enhancing biodiversity in the wider environment is a key principle of national planning policy and examples of how developments can contribute to the creation/extension of a network to maintain biological diversity should be provided (referencing the GI policy). Richmond could refer to two equivalent policies in Wycombe District Council's Local Plan (DM13 and DM14) and its associated Wye Valley Advice Note for comparison. We welcome a standalone policy on biodiversity within the Borough but in addition, biodiversity should also be integrated into several other policies:</p> <ul style="list-style-type: none"> <li>• CP3 (Climate Change – Adapting to the Effects) and DM SD 4 (Adapting to Higher Temperatures and Need for Cooling) – should also mention the impact of climate change on biodiversity and how those impacts can be avoided/mitigated, e.g. by maintaining/creating a network of green corridors</li> <li>• DM SD 5 (Living Roofs) – Could incorporate suggestions for biodiversity enhancements</li> <li>• DM SD 7 (Sustainable Drainage) - Could incorporate suggestions for biodiversity enhancements. In addition, SUDS should also try to align with WFD water quality failures where possible, i.e. by considering SUDS in areas in which they might remedy these failures.</li> <li>• DM OS 1 (Major development site in the Green Belt – Hampton Water Treatment Works is designated as a Site of Nature Conservation Importance (SNCI) for its flower rich grassland and habitat for water birds. Efforts should be made to contact the SNCI officer for the Borough (if one exists) to understand the sensitivities of the site and how its ecological value can be preserved.</li> </ul> <p>DM OS 9 (Floodlighting) – We welcome the consideration of the effect of flood lighting on biodiversity but this shouldn't be constrained to designated sites. Reference should also be made to consideration of impacts on the river corridors and species such as bats whose foraging and commuting lines are affected by lighting</p> <p><b>Section 2</b></p> <p><b>Emerging Site allocation feedback</b></p> <p>We are pleased to see the majority of the proposed site allocations are outside the highest risk flood zones. Some sites are adjacent to rivers and we have included feedback below for each site allocation. These sites should also be assessed as part of your Sequential Test process using latest flood risk evidence and data from your updated Strategic Flood Risk Assessment to steer development to the lowest risk flood zones. We encourage early pre application discussions to ensure development proposals do not increase flood risk and the site design and layout is informed by the latest flood risk data and climate change allowances. All the</p>

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		<p>existing site allocation should also be assessed for any changes to flood zones or impacts of climate change. All the proposed site allocations offer opportunities to improve surface water by incorporating Sustainable Drainage Systems. Development at these sites should be informed by the latest environmental good practice and deliver high standards of sustainable design and construction. All sites over 1 hectare should demonstrate how surface water will be managed in a Flood Risk Assessment in discussion with your drainage team as the Lead Local Flood Authority. We have produced joint guidance on how new development can improve the environment which is available below: <a href="https://www.gov.uk/government/publications/planning-a-guide-for-developers">https://www.gov.uk/government/publications/planning-a-guide-for-developers</a></p> <table border="1"> <thead> <tr> <th>Flood Zone 1</th> <th>Flood Zone 2</th> <th>Flood Zone 3</th> </tr> </thead> <tbody> <tr> <td>Lowest risk No rivers or flood defences on site or adjacent</td> <td>Medium risk Rivers/flood defence near to the site</td> <td>High risk River/flood defences on site/adjacent</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Site Name</th> <th>Current flood zone designation</th> <th>Rivers on / adjacent to site / flood defences</th> <th>Comments to add into site allocation</th> </tr> </thead> <tbody> <tr> <td>1. Hampton Square, Hampton</td> <td>1</td> <td>None</td> <td></td> </tr> <tr> <td>2. Hampton Traffic Unit, 60-68, Station Road, Hampton (TW12 2BX)</td> <td>1</td> <td>None</td> <td>Contaminated land report required due to previous land uses</td> </tr> <tr> <td>3. Hampton Delivery Office, Rosehill, Hampton</td> <td>1</td> <td>None</td> <td>Contaminated land report required due to previous land uses</td> </tr> </tbody> </table>				Flood Zone 1	Flood Zone 2	Flood Zone 3	Lowest risk No rivers or flood defences on site or adjacent	Medium risk Rivers/flood defence near to the site	High risk River/flood defences on site/adjacent	Site Name	Current flood zone designation	Rivers on / adjacent to site / flood defences	Comments to add into site allocation	1. Hampton Square, Hampton	1	None		2. Hampton Traffic Unit, 60-68, Station Road, Hampton (TW12 2BX)	1	None	Contaminated land report required due to previous land uses	3. Hampton Delivery Office, Rosehill, Hampton	1	None	Contaminated land report required due to previous land uses
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		4. Platts Eyot, Lower Sunbury Road, Hampton	1, 2 and 3	Island surrounded by River Thames	<p>Proposals for introducing new housing to this high flood risk island site may be inappropriate. Allocating this island site for new residential uses would need to follow Sequential test demonstrating no lower risk sites are available and would not result in increased risk to life/property and demands on the emergency service during a major flood event.</p> <p>Replacement/improvements to existing buildings should be resilient and informed by the latest flood risk and climate change evidence. We support the need to retain/improve boatyards/repairs workshops etc to support an active River Thames. We understand the need to retain the heritage value of buildings on this island and suggest alternative funding is sought for improving the island such as the Heritage Lottery funding sources rather than introducing new residential development.</p>
		Teddington Delivery Office, 19 High Street, Teddington (TW11 8EG)	1	None	Contaminated land report required due to previous land uses
		6. Telephone Exchange, High Street, Teddington	1	None	Contaminated land report required due to previous land uses
		7. Strathmore Centre, Strathmore Road, Teddington (TW11 8UH)	1	None	
		8. Richmond upon Thames College, Egerton Road, Twickenham (TW2 7SJ)	1	Duke of Northumberland's River nearby River Crane to the south	<ul style="list-style-type: none"> <li>Flood Risk Assessment required</li> <li>If this site designation is extended to the south to include the playing fields area it include Flood Zone 3 and the River Crane</li> <li>8 metre buffer zone and river/flood defence improvements required between development and the River Crane. Excellent potential for major river restoration/enhancements, with major improvements to the riverside environment.</li> </ul>
		9. Mereway Day Centre, Mereway Road, Twickenham	2	Site adjacent to the River Crane	<ul style="list-style-type: none"> <li>Flood Risk Assessment required</li> <li>8 metre buffer zone and flood defence / river improvements required between development and the River Crane. Excellent potential for major river</li> </ul>

Ref. no.	Name / Organisation	Detailed comment		
				restoration/enhancements, with major improvements to the riverside environment
	10. St Mary's University College, Waldegrave Road, Twickenham, TW1 4SX	Currently most of the site is Flood Zone 1 (Eastern side of the site borders a high risk Flood Zone 3)	Site 170 metres from tidal flood defences	<ul style="list-style-type: none"> <li>Due to proximity to high risk flood zone proposed redevelopment needs to take account of climate change and be informed by latest flood map updates</li> </ul>
	11. Central Depot, Langhorn Drive, Twickenham	1	Duke of Northumberland's River on western boundary of the site River Crane to south east corner of the site	<ul style="list-style-type: none"> <li>Any redevelopment needs to incorporate 8 metre buffer zone and flood defence/ river improvements required between development and Duke of Northumberland's river. Excellent potential for major river restoration/enhancements, with major improvements to the riverside environment.</li> <li>Contaminated land report required due to previous land uses</li> </ul>
	12. Harlequins Rugby, Langhorn Drive, Twickenham	1	Duke of Northumberland's River adjacent	<ul style="list-style-type: none"> <li>Any redevelopment needs to incorporate 8 metre buffer zone and flood defence/ river improvements required</li> </ul>
	13. Rugby Football Union, Whitton Road, Twickenham	2	Duke of Northumberland's River Whitton Brook	<ul style="list-style-type: none"> <li>Any redevelopment needs to incorporate 8 metre buffer zone and flood defence/ river improvement</li> </ul>
	14. Ryde House, East Twickenham	3	Thames (Tidal) Flood defences	Flood Risk Assessment required
	15. Richmond Station and above track, Richmond	None		
	16. Pools on the Park and surroundings, Old Deer Park, Richmond	1	None	<ul style="list-style-type: none"> <li>Contaminated land report required due to previous land uses</li> </ul>
	17. The Richmond Athletic Association Ground, Old Deer Park, Richmond	1	None	Any redevelopment should consider impacts upon the site's neighbouring SNCI, Royal Mid Surrey Golf Course which is designated for its wetland habitats (and acid grassland).
	18. Friars Lane Car Park, Richmond	3	Thames (Tidal) – about 45 metres away	Sequential test required

Ref. no.	Name / Organisation	Detailed comment			
		19. Ham Central Area, Ham	1	None	Flood Risk Assessment required
		20. St Michael's Convent, Ham Common	1	None	Contaminated land report required due to previous land uses
		21. Cassel Hospital Ham Common, Ham	1	None	Contaminated land report required due to previous land uses
		22. Kew Biothane Plant, Mellis Avenue, Kew	3	River Thames (Tidal) Flood Defences (Borders river)	<ul style="list-style-type: none"> <li>• Site should follow sequential test if residential land uses proposed to demonstrate no lower risk sites are available</li> <li>• Flood Risk Assessment required and development should be informed by the TE2100 plan</li> <li>• Contaminated land report required due to previous land uses</li> <li>• Site offers opportunities for improving the riverside environment</li> </ul>
		23. Telephone Exchange, East Sheen	1	None	Contaminated land report required due to previous land uses
		24. Mortlake and Barnes Delivery Office , 2-12 Mortlake High Street, Mortlake (SW14 8JB)	3	90 metres from River Thames (Tidal) and flood defences	<ul style="list-style-type: none"> <li>• Sequential test required</li> <li>• Flood Risk Assessment required and development should be informed by the TE2100 plan</li> </ul>
		25. Stag Brewery, Lower Richmond Road, Mortlake (SW14 7ET)	3	Site adjacent to River Thames (Tidal) and flood defences	<ul style="list-style-type: none"> <li>• Sequential test/exception test required</li> <li>• Redevelopment of this former industrial site offers an excellent opportunity for improving a brownfield riverside site and improving the environment, tidal flood defences and Thames Path in line with TE2100 plan actions and improve linkages to Mortlake and Barnes</li> <li>• Development should consider options to incorporate tidal terracing and set back flood defences in line with the Estuary Edges guidance to increase the amount of natural river bank, currently only 2% of the tidal banks are natural across the estuary. Increasing natural riverbanks will have a significant positive ecological impact on the river and will help restore fish stocks and manage flood risk</li> <li>• <a href="http://www.ecrr.org/Portals/27/Publications/Estuary%20Edges%20-%20design%20advice.pdf">http://www.ecrr.org/Portals/27/Publications/Estuary%20Edges%20-%20design%20advice.pdf</a></li> <li>• A Flood Risk Assessment and Water Framework Directive Assessment required and we encourage</li> </ul>

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				early pre application discussions <ul style="list-style-type: none"> <li>Contaminated land report required due to previous land uses</li> </ul>												
	26. Barnes Hospital, South Worple Way, Barnes	1	None	Contaminated land report required due to previous land uses												
	27. St Claire Business Park	1	None													
	28. Telephone Exchange, Whitton	1	None													
<p><b>Section 3 –Sustainability Appraisal Scoping report feedback</b></p> <p>We welcome the detailed environmental and flood risk evidence included within the scoping report which will help to inform robust local plan policies and the site allocation process. The evidence base should be regularly reviewed and updated using the latest environmental evidence and flood risk and climate change. Environmental data is available from datashare in the link below . We feel the key evidence base are included. We recommend reference to the following strategies and guidance within Appendix 1 of the scoping report.</p>																
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			includes an opportunity map which includes the River Thames in Richmond upon Thames to Teddington Lock.	Vision/Thames-Vision-Consultation-on-emerging-Goals-and- Priority-Actions
		<b>River Crane Catchment summary for Water Framework Directive (WFD)</b>	This summaries the current state of the water environment across the Crane Catchment and suggestions on improving the water environment. We are producing similar catchment summaries for the Thames and Beverley Catchments.	Attached to our response
		<b>Thames Estuary 2100 (TE2100) briefing for London Borough of Richmond upon Thames</b>	This key the actions required across the London Borough of Richmond upon Thames to ensure the borough is resilient to the changing climate and sea level rise as part of the TE2100 plan.. We recommend including this as an appendix to your updated Strategic Flood Risk Assessment (SFRA).	Attached to the EA response
77.	Ann Holdsworth, Amec Foster Wheeler obo National Grid	<p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p> <p><b>Further Advice</b></p> <p>National Grid is happy to provide advice and guidance to the Council concerning our 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. 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 our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:</p>		
78.	Katharine Fletcher, Historic England	<p>Thank you for the opportunity to comment on the scope and rationale of the local plan policies in advance of the formal consultation on the local plan review. This letter also encompasses Historic England's response on the Sustainability Appraisal scoping report. As the Government's statutory adviser Historic England is keen to ensure that the protection and enhancement of the historic environment is fully taken into account at all stages and levels of the Local Plan process.</p> <p>The <i>National Planning Policy Framework</i> identifies the historic environment as a relevant matter contributing to sustainable development (para 7), and includes it within the core planning principles (para 17). National policy advocates an active, positive approach to the historic environment (paras 126 and 157) and recognises the value that the historic environment can bring to inspire high quality design in new development (paras 58 to 61). The following comments are made in the context of the principles in the NPPF, taking into consideration that the adopted core strategy and development management document were adopted prior to its publication.</p> <p><b>Comments on the Summary of the Review: Chapter 4</b></p> <p>- Sustainable development (policies CP1, CP3, DM SD, SD3SD6 and SD8)</p> <p>Historic England supports the proposed approach in para 4.1.2 to ensure that the local plan clearly addresses sustainable development using the overarching definition in the National Planning Policy Framework (para 7). This is a good opportunity to set out the breadth of considerations that are encapsulated within the definition, including that the historic environment is identified as a key strand within the environmental dimension. This is carried through into the Framework's core planning principles, para 17(10), which states that planning should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.</p>		

Ref. no.	Name / Organisation	Detailed comment
		<p>We agree also with the proposal for a separate policy addressing sustainable construction. It will be helpful to continue to refer in the plan to specific background documents, and we suggest that you include the Historic England advice on retrofitting historic buildings and energy conservation '<i>Energy efficiency and Historic Buildings</i>'.<sup>1</sup> This provides technical advice to help prevent conflicts between energy efficiency requirements in Part L of the building regulations and the conservation of historic and traditionally constructed buildings. With regard to climate change adaptation, our advice '<i>Flooding and Historic Buildings</i>' could be referred to and is available on the Historic England website.<sup>2</sup></p> <p><u>- Historic Environment</u></p> <p>The issues for the historic environment as set out in this section are very welcome and we support the analysis. Historic England considers that the currently adopted local plan policies are generally strong, but require updating to ensure alignment with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The borough's exceptional historic environment justifies a number of individual policies for different heritage assets, including separate policies for the Royal Botanic Gardens Kew World Heritage Site, and for archaeology. We recommend that policies are both reflective of national policy and guidance but also refer to the local evidence base to ensure a distinctive approach based on the historic environment of Richmond. As referenced in para 4.2.2, the local plan policies should reflect a positive strategy for the historic environment. National Planning Practice Guidance (PPG) explains that such a strategy should be an active programme, identifying specific opportunities for conservation and enhancement of heritage assets. This can delivered in the plan through the heritage policies, and through other policies where there is an inter-relationship with 1 HE advice 'Energy efficiency and Historic Buildings can be found at: <a href="https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/">https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/</a></p> <p>2 HE advice 'Flooding and Historic Buildings' can be found at: <a href="https://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/">https://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/</a> the delivery of the strategy for conservation. (NPPF para 126 and PPG Ref: 18a-004-20140306).</p> <p>At our recent meeting we discussed the preparation of a Heritage Topic Paper to support the local plan, bringing together the evidence base and identifying priorities for a positive strategy. We strongly support the Council's initiative of preparing Village Plans based on identified character areas. This is a significant programme of work and will, in the coming months, cover the entire borough. The analysis can support local plan policies in requiring new development to make 'a positive contribution to local character and distinctiveness' (NPPF para 126). We recommend that once the Village Plans are completed across the borough that you take the opportunity to add a strategic overview, to bring to the fore the significance of Richmond's exceptional heritage in a local and London-wide context. This can build on the character areas established through the Village Planning SPDs and need not be a major piece of work.</p> <p><u>Examples of borough-wide characterisation reports include:</u></p> <p>Enfield Characterisation Study at: <a href="http://www.enfield.gov.uk/downloads/download/49/characterisation_study">http://www.enfield.gov.uk/downloads/download/49/characterisation_study</a> which is incorporated within the 2011 Characterisation study by Urban Practitioners, and</p> <p>Hounslow Urban Character and Context study at: <a href="http://www.hounslow.gov.uk/context_and_character_study">http://www.hounslow.gov.uk/context_and_character_study</a></p> <p>As part of a positive strategy in line with NPPF paras 126 and 157(parts 3,7,8) it will be important to ensure that known and potential threats to the borough's heritage assets are addressed in the plan. In this context Historic England will be pleased to join discussions and advise on necessary analysis for the protection of the setting of Royal Botanic Gardens Kew World Heritage Site, including the cross boundary issues raised by recent tall building proposals in Brentford. The outcome could be referred to within the policy for the World Heritage Site to ensure that its setting is understood to be more extensive than the defined buffer zone.</p> <p>A positive conservation strategy will also address heritage assets that are currently identified on Historic England's Heritage at Risk Register, or heritage assets that could become at risk, for instance, through redundancy from their present use. The site allocations include Platts Eyot, where the boathouses are currently at risk; you have also mentioned that Kneller Hall is being released by the</p>

Ref. no.	Name / Organisation	Detailed comment
		<p>Ministry of Defence. In both cases, and in others, we would be pleased to discuss the heritage issues that the plan could include as guidance.</p> <p>Clarity will be needed in the local plan policies with regard to the intangible heritage of the borough that brings significance by association; for instance, the landscape and views portrayed in art and literature. A Heritage Topic Paper can assist with this by laying out the different heritage values that need to be considered to sustain the significance of the borough.</p> <p>Specific comments from the Greater London Archaeological Advisory Service (GLAAS) on the adopted policies for archaeology are appended to this letter. Should you wish to explore the possibility of bringing forward the review of the Archaeological Priority Areas in Richmond to coincide with the local plan review.</p> <p><u>- Design and Character</u></p> <p>The NPPF places emphasis on the way in which the historic environment should be understood and taken into consideration as the context for new development, stating that ‘developments should respond to local character and history’ and that ‘planning policies should address the connections between people and places and the integration of the natural, built and historic environment’ (paras 58 and 61).</p> <p>With respect to tall buildings, the present policy identifies limited opportunities in the town centres, and seeks to respect local context by proposing specified additional storey increases above the prevailing building heights. We consider that this is a suitable approach. The proposal to distinguish between ‘tall’ and ‘taller’ buildings may appear to offer a nuanced approach; however, we would caution against adding complexity or setting a rule for ‘taller’ buildings across the borough which may have a variable impact in terms of the local context. We would be pleased to discuss this further in relation to Historic England’s recently published guidance.</p> <p><b>Appendix 2 Proposed Sites to be allocated for Development</b></p> <p>The sites identified within Appendix 2 include a number with heritage interest. At this stage it is not clear what is proposed for these sites, or what guidance will be given within the plan with respect to the heritage assets affected. We note, for instance, that Buildings of Townscape Merit and listed buildings fall within some sites. In view of the lack of information at this stage we would like the opportunity to comment more fully following further discussion.</p> <p><b>Sustainability Appraisal Scoping Report</b></p> <p>Historic England is pleased to see that earlier suggestions are largely incorporated within the SA scoping report, and that new publications, such as the Historic Environment Good Practice Advice notes are included. Consequently, our comments are few, and these are set out below. Plans and Programmes</p> <ul style="list-style-type: none"> <li>- Regional context – the Mayor’s World Heritage Sites SPG could be included here</li> <li>- Local context – Conservation Area Appraisals could be included here</li> <li>- Key findings – in para 2.3.4, sustainable development, we recommend that the text in line 12 reads ‘... protecting and enhancing the <i>natural, built and historic</i> environment, ensuring social ..’ thereby identifying the historic environment in terms that align with the NPPF phrasing. (paras 61 &amp; 157)</li> <li>- Key findings – in para 2.3.4, Historic environment, amend the second sentence to ‘The conservation of these <i>heritage</i> assets <i>and their settings</i> should be a key priority of the plan and policies should be in place to <i>protect them from harm and to take opportunities to enhance their significance...</i>’</li> </ul> <p><u>Baseline information</u></p> <p>Historic Environment, 3.24 – The baseline information in this section is helpful, and we are pleased to see the additions arising from Historic England’s previous comments. It would be suitable to include reference to the information in the emerging Village Plan character areas. Indicators for the Historic Environment are a matter which could be given more thought, to encompass both</p>

Ref. no.	Name / Organisation	Detailed comment
		<p>condition (eg. the number of heritage assets at risk) and the factors that the plan can readily influence (eg. the number of permissions where enhancement or harm to heritage assets has occurred).</p> <p><u>Sustainability Issues</u> The historic environment sustainability issue in table on p88 requires amendment to include 'and their settings' as has been incorporated within the table on p89.</p> <p><u>SA Framework</u> For sustainability objective 7, the first decision-making criterion should be amended to: 'Will it affect the significance of heritage assets through direct impacts or impacts on their setting?'</p> <p><b>Comments from the Greater London Archaeological Advisory Service (GLAAS)</b> The following comments provide suggestions for suitable changes to the text currently supporting the adopted Development Management Policy DM HD4.</p> <p>Para 4.3.18 <i>Archaeological investigations in Richmond to date have revealed evidence of prehistoric, Roman, Saxon, Medieval and post Medieval archaeology. An archaeological site is a place (or group of physical sites) in which evidence of past activity is preserved and can also include industrial sites, marine and foreshore deposits/structures, buildings, machinery, roads, artefacts, wartime structures and modest domestic buildings.</i> The preservation of archaeological remains is a material consideration when determining planning applications. As set out in the <i>NPPF archaeological remains of national importance should be preserved in situ</i>. While it is desirable to treat all remains in this manner, it is recognised that it is not always practical to do so.</p> <p>Para 4.3.19, first sentence: Change PPS 5 to NPPF in the first sentence.</p> <p>Para 4.3.19, second sentence: Amend to read: '<i>Prospective developers should make an initial assessment of the archaeological potential and significance of a site by consultation with the appropriate specialist bodies, Historic England and the Greater London Archaeology Archaeological Advisory Service (GLAAS)</i>'. This could go on to state '<i>The Greater London Archaeology Advisory Service (GLAAS) are the Borough's archaeological advisers and should be consulted with regard to archaeological matters</i>'.</p> <p>Para 4.3.19, fourth sentence: Currently, the borough's archaeological priority areas (APAs) are due to be reviewed in 2018, as part of a rolling programme of reviews across London. The current APAs are out of date and no longer contain a reliable data set and thus review is required. We therefore recommend that this sentence is amended to read: <i>'Archaeological Priority Areas (APAs) can be identified by Local Planning Authorities under the Town and Country Planning Act 1990 and the Richmond APAs are shown on the Borough's Archaeological Constraints Map. The map can be accessed at the following link:'</i> <a href="#">ADD LINK</a></p> <p>If, however, the Borough wished to fund a fast track service for reviewing Richmond's APAs we would be very happy to discuss this. Our estimate at this time is that the review could be carried out during the next financial year to provide a draft for approval by the Borough, and we could provide more detailed project costing, estimates and a project plan on request. Other planning authorities have commissioned this work, such as the London Borough of Croydon and we could provide contact details for the case officer if that would be helpful.</p> <p>The link below is for the reviewed APAs for the London Borough of Newham (please note Newham have always had a great deal of the Borough covered by APAs and the Richmond APAs would not follow a similar pattern): <a href="#">LINK TO NEWHAM APA DOCUMENT</a></p>

Ref. no.	Name / Organisation	Detailed comment
		<p><a href="https://www.newham.gov.uk/Documents/Environment%20and%20planning/DPDEvidenceArchaeological.pdf">https://www.newham.gov.uk/Documents/Environment%20and%20planning/DPDEvidenceArchaeological.pdf</a>            Para 4.3.20            Amend to read: ‘..... published by <i>Historic England. Archaeological work should be in accordance with current guidance from the Chartered Institute of Field Archaeologists and GLAAS guidance.</i>’</p>
79.	David Shaw, The Alberts Community Association	<p>1. Thank you for including the Alberts Community Association (ACA) in the distribution of your circular letter of 31 December to interested parties with regard to the above.            2. Firstly our apologies for not meeting your deadline of 1 February for initial comments on the proposed scope and rationale for the review and would ask that you continue to keep us in the correspondence loop. The catchment area we have represented for over 30 years comprises some 500 properties of mainly small Victorian terraced housing plus a number of small business’s, within the St Matthias Conservation Area and a short walk from both Richmond town centre and Richmond station. To our surprise we have recently been much involved in the debate over controls on basement developments – an issue that sent shock waves through our community as far as it affects our housing, constructed much as it is with minimal foundations and very thin party walls. This follows the Alberts’ first approved planning application (13/0154/HOT) for a basement development. We therefore much welcome the document statement (Appendix 1, p31) that a scrutiny panel “will be set up to investigate basement developments in the borough” and would very much like to be involved in this process as an example, not untypical of many similar areas throughout the borough, of small Victorian terraced housing.</p>
80.	Laura Stritch, Transport for London Property	<p>The following comments represent the views of officers in Transport for London Commercial Development Property Team (TfL Property) in its capacity as a significant landowner only and does not form part of the TfL corporate response. This Representation should not be taken to represent an indication of any subsequent Mayoral decision in relation to the emerging policy document. Our colleagues in Borough Planning will provide a separate response regarding TfL wide operational and land use planning/transport policy matters.</p> <p>London Buses are the freeholder of Twickenham Bus Station, Station Yard, identified as proposal site TW2 in the Twickenham Area Action Plan. Subject to the operational status of the bus standing facility, TfL Property would welcome a partnership with Network Rail (subject to agreement) and London Buses to bring forward a viable and comprehensive development at this site, and as such for it to remain an allocated proposal by the council and travel from the Twickenham AAP into the Site Allocations DPD. Further details on capacity can be provided to the council upon request.</p>

**Table 2:** Detailed responses to the consultation

## Appendices:

1. CBRE obo The Laboratory of the Government Chemist (23) – Boundary Definition map
2. Richard Geary (29) – Photo
3. GVA obo Lady Eleanor Holles School (41) – *LEHS Consultation Response, including population projection graph*
4. GVA obo Lady Eleanor Holles School (41) – Core Strategy Proposals Map
5. GVA obo Lady Eleanor Holles School (41) – Proposed Amended MOL designation plan
6. Transport for London Planning (42) – Vehicle Cross over guidance
7. Alice Shackleton (43) – Nitrogen Dioxide graph 2011
8. Indigo Planning Limited obo Sainsbury's Supermarkets Ltd (56) – Site Location Plan
9. Cllr Liz Jaeger (56) – Crane Way in Whitton Photo
10. Defence Infrastructure Organisation (61) – Red Line Boundary Kneller Hall map
11. Barton Wilmore obo UK Pacific Hampton Station LLP (74) – Mayor of London, Office for Policing and Crime, Disposal of Buildings
12. Environment Agency (76) – Crane Waterbody Summary 2015
13. Environment Agency (76) –TE2100 Local Council Briefing Document London Borough of Richmond

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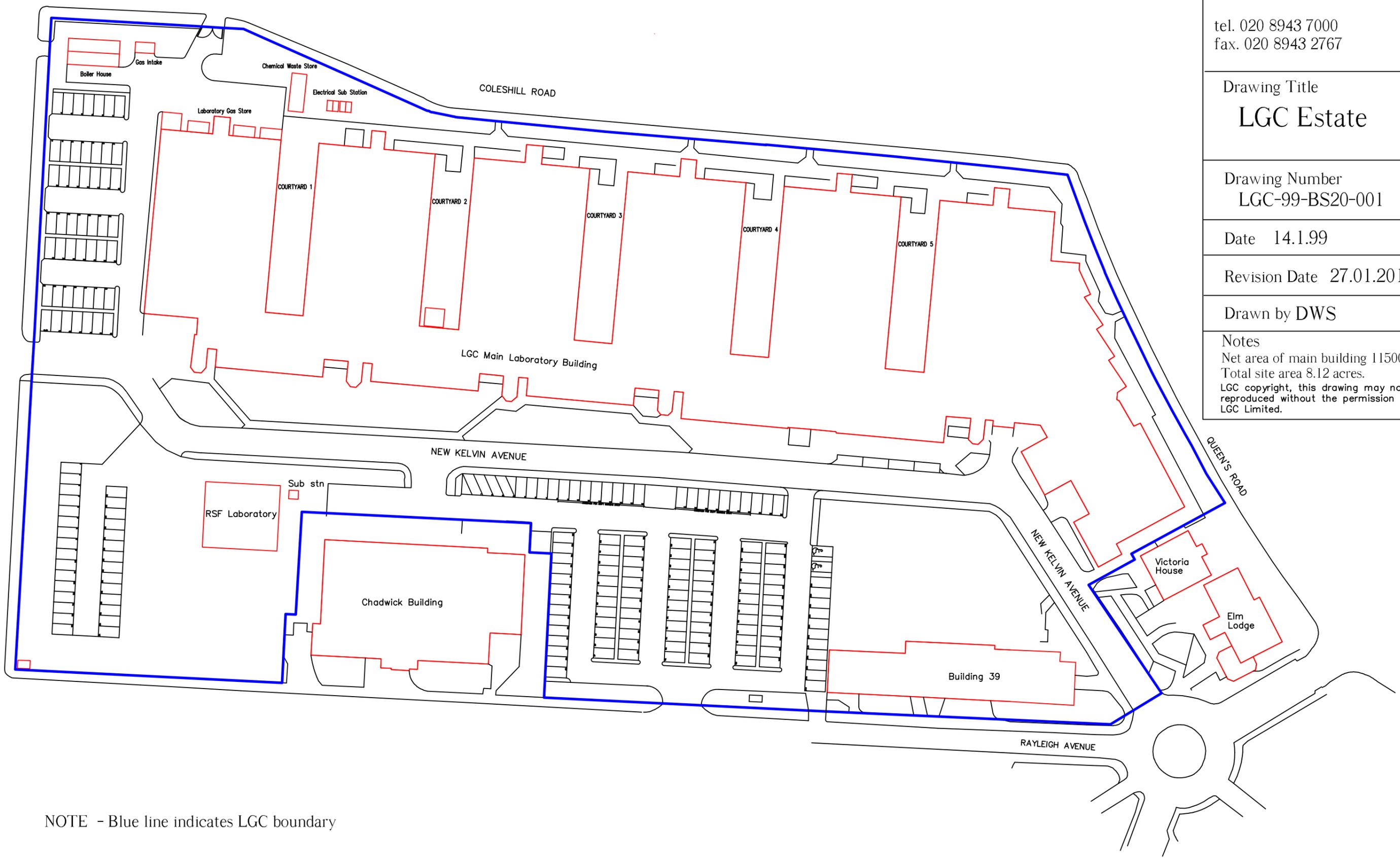
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Date 14.1.99

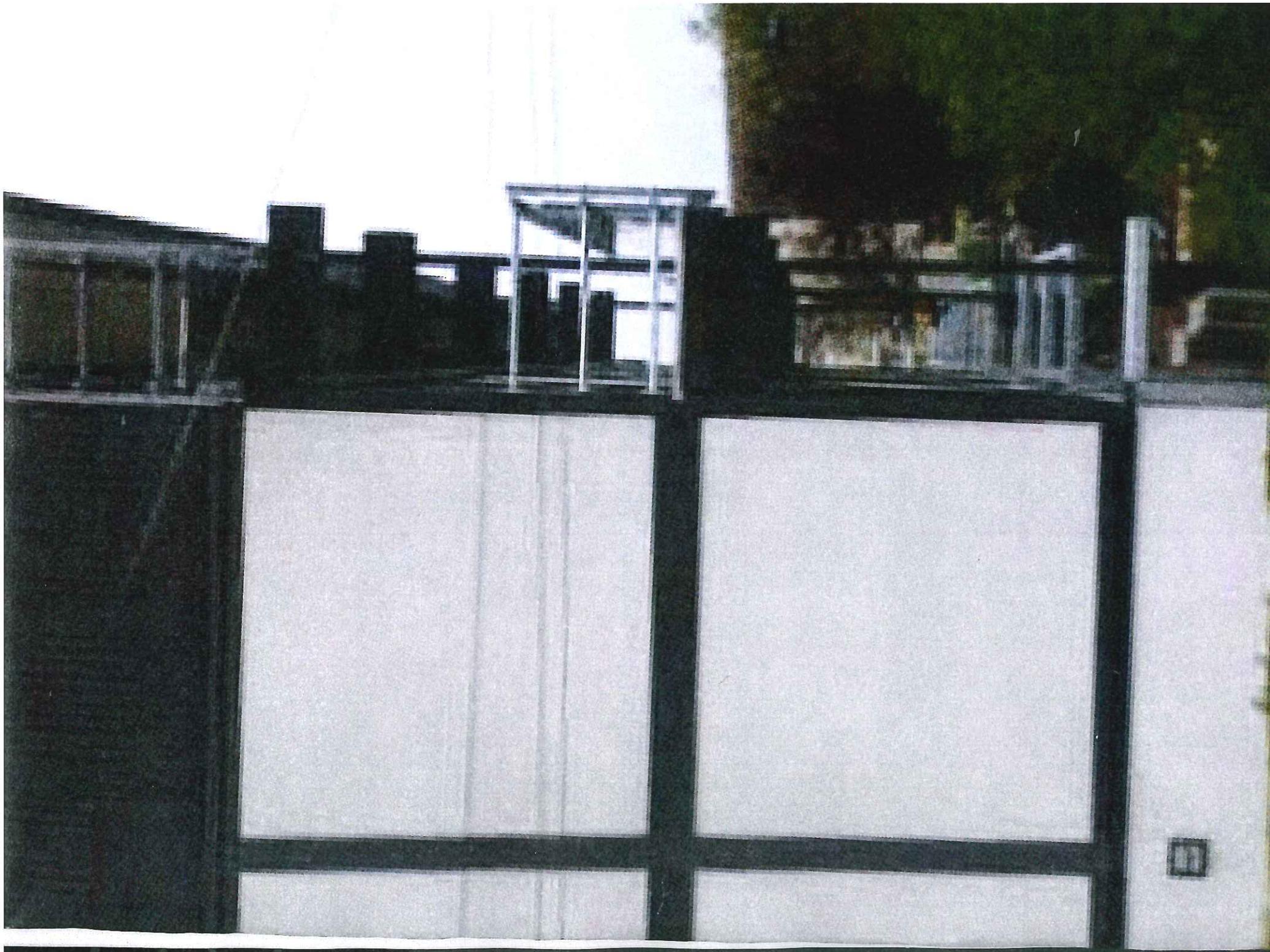
Revision Date 27.01.2016

Drawn by DWS

Notes  
Net area of main building 11500 m2.  
Total site area 8.12 acres.  
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NOTE - Blue line indicates LGC boundary





Our ref: 02B317567

29 January 2016

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Dear Sir or Madam

**London Borough of Richmond upon Thames, Local Plan  
Consultation on the scope and rationale for the review of planning policies, together with the emerging  
site allocations**

We write on behalf of the Lady Eleanor Holles School (LEHS) regarding the consultation LB Richmond is currently undertaking in preparation for the new Local Plan.

GVA previously submitted representations, on behalf of LEHS, to the pre-publication consultation on the Site Allocations DPD. The representations proposed the allocation of the school for education use and an amendment to the Metropolitan Open Land (MOL) boundary in order to establish a positive policy position to support the expansion of the school.

We understand that this consultation is limited to the scope and rationale of the planning policy review, but find that the proposed scope of review for the following planning policies does not go far enough:

- CP18 (Education and Training)

We recommend that LB Richmond's proposed update to the policy (to 'more accurately reflect local needs') addresses the need for places at independent schools, as well as state-funded schools. The current evidence base considers only state schools and does not take account of the contribution made by schools such as LEHS. Policy CP18 should be revised to plan positively for *all* school places, including independent schools.

- DM OS 2 (Metropolitan Open Land)

In the context of increasing pressure on school places, and the policy support (at all levels) for the provision of education facilities, we recommend a revision to Policy DM OS2 to include an exception clause for education uses (where it can be demonstrated that there is a clear need for development). In addition, we recommend that the Council review the MOL boundary at Lady Eleanor Holles School.



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We explore each of these policies in detail below:

## **1. CP18 (Education and Training)**

### Evidence of education need

The shortage of school places in London is well documented; the supporting text of London Plan Policy 3.18 states that London's population is younger than other places in England and Wales, and that by 2036 the London school age population is projected to increase by 18% (paragraph 3.102).

According to the Independent Schools Council, over 7% of the total number of school children in England are educated in the independent sector.

The GLA's 'Projected Demand for School Places' report (November 2015) shows that, for London as a whole, demand for state-funded primary school places is projected to increase by 60,000 pupils (8.8%) over the decade to 2024/25, and demand for independent primary school places is projected to increase by 10,000 (9.1%) by 2019/20 (if the proportion of children attending state and independent schools remains constant).

For secondary school places, the report shows that demand for state-funded places is projected to increase by 105,000 pupils (26.5%) over the decade to 2024/25, and demand for independent school places is projected to rise by 18,000 (24%) by 2024/25.

The data from the GLA report also shows net cross border flows for independent primary and secondary schools for 2014/15. For Hampton North Ward (of which Lady Eleanor Holles School is a part), there was a net inflow of both primary and secondary school pupils into the Ward. Schools in Hampton North Ward are therefore catering for demand at both a local and a more strategic level.

### Planning Policy

In a context of increasing pressure on state-funded and independent school places in London, the NPPF states that 'the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities' (paragraph 72). The NPPF (paragraph 72) encourages local planning authorities to 'take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education'.

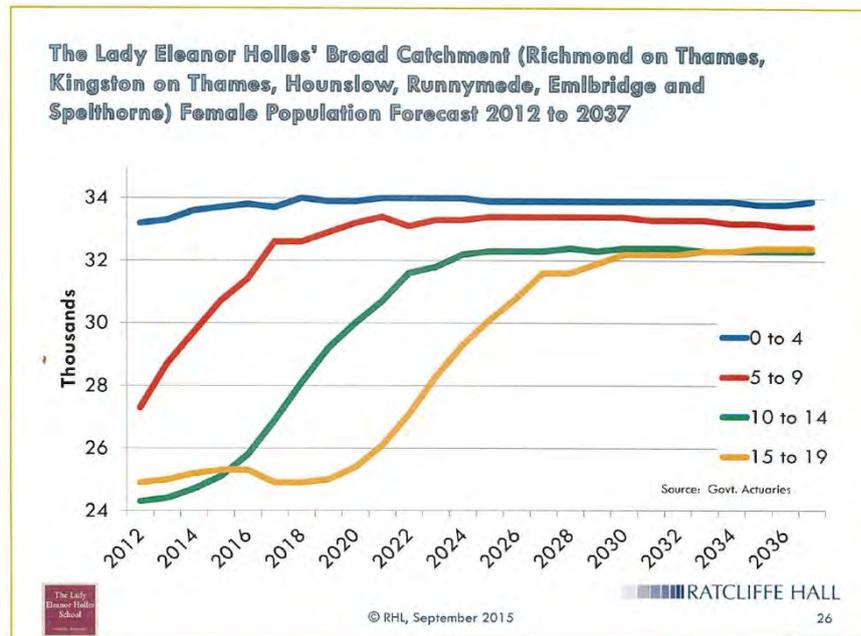
The NPPF position is reflected in London Plan Policy 3.18, which states that LDFs should provide the framework to 'secure sites for future provision recognising local needs and the particular requirements of the education sector'. In addition, the supporting text of the policy explains that national education policy favours greater diversity in the nature of supply, through greater devolution of responsibilities from local authorities to schools.

The existing local planning policy reflects the requirements set out in the NPPF and London Plan. Core Strategy Policy CP18 recognises that demand for primary places is particularly high in Richmond, and states that 'the Council will ensure that the provision of schools, pre-schools and other education and training facilities are sufficient in quality and quantity to meet the needs of residents'. In addition, the policy notes that 'the potential of existing educational sites will be maximised through redevelopment, refurbishment or re-use to meet educational need.'

In a context of increasing need for school places, planning policies relating to education facilities at the national, strategic and local level are explicitly pro-development and do not distinguish between state-funded and independent schools.

### Evidence of need at LEHS

Evidence from the School's own surveys, compiled by Ratcliffe Hall (an established consultancy in the independent education sector), demonstrates a clear need for the expansion of education facilities. According to the report, the female population in the LEHS catchment area (which includes Richmond on Thames, Kingston on Thames, Hounslow, Runnymede, Emlbridge and Spelthorne) will rapidly increase between 2016/17 and 2026 for age groups 5-19. The graph below shows the population projection:



**Table 1: Female Population in the LEHS catchment area**

The evidence also shows that a number of nearby independent schools are full and currently run a waiting list. In recent years, LEHS has had capacity to admit only a third of pupils that apply to the senior school (year seven).

In accordance with the approach encouraged in paragraph 72 of the NPPF, the Governors at Lady Eleanor Holles School would welcome the opportunity to work collaboratively with the Local Authority, to discuss their plans to expand the school and, by catering for some of the need for independent school places, to potentially relieve some of the pressure on education facilities in the borough.

Recommendation for scope of policy review

As mentioned above, London Plan Policy 3.18 requires that LDFs provide the framework to 'secure sites for future provision recognising local needs and the particular requirements of the education sector'. Indeed, local authorities have a duty under Section 13A of the Education Act 1996 (as amended by the Educations and Inspections Act 2006) to ensure fair access to educational opportunity.

We welcome the Council's proposal to update Policy CP18 so that it more accurately reflects local needs. But, in light of evidence that need is projected to increase for both state-funded and independent school places, we recommend that LB Richmond's assessment of local need should address the increasing need for both state-funded and independent school places.

Further, the supporting text of London Plan Policy 3.18 explains that national education policy favours greater diversity in the nature of supply. In support of diversity in the nature of supply, and in the interests of 'development that will widen choice in education', LB Richmond's review of Policy CP18 must address need arising from independent schools, as well as that arising from state-funded schools.

## 2. DM OS2 (Metropolitan Open Land)

### Planning Policy

In accordance with London Plan Policy 7.17, Metropolitan Open Land is afforded the same level of protection as Green Belt. Paragraph 80 of the NPPF identifies the Green Belt as serving the following purposes:

- To check unrestricted sprawl of large built up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Metropolitan Open Land (MOL) designation is established in the London Plan. Policy 7.17 allows only 'appropriate development' that is limited to small scale structures to support open uses, and which minimises adverse impacts on the openness of the MOL. In order to be designated as MOL, land must meet one of the following criteria:

- It contributes to the physical structure of London by being clearly distinguishable from the built up area;
- It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;
- It contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value; and
- It forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.

Current local policy on Metropolitan Open Land is set by policy DM OS2 of the Development Management Plan (2011), and the existing MOL designation is shown on the Core Strategy Proposals Map (attached to this letter). The policy states that the borough's Metropolitan Open Land will be protected and retained in predominantly open use. The policy lists appropriate uses in MOL but recognises that there may be exceptional circumstances where appropriate development, such as small structures, is acceptable- but only if it does not harm the character and openness of the MOL and is linked to the functional use of the MOL or is for essential utility infrastructure.

### Strategic policy conflict

The protectionist policies described above should be considered in the context of the pro-development policies relating to education facilities. There is strong policy support at national, strategic and local level for the expansion of existing education facilities, in a context of increasing pressure on school places and the legal obligation for local authorities to ensure fair access to educational opportunity.

Despite the clear policy support for the expansion of education facilities, the development of many school sites in LB Richmond (and much of London) is constrained by the MOL designation. This strategic policy conflict, between education provision and Metropolitan Open Land, presents a significant obstacle in the local authority's ability to implement planning policies relating to education provision.

### Recommendation for scope of policy review

We note that the Council do not propose to review the Metropolitan Open Land (MOL) boundaries as part of the new Local Plan, with the exception of the MOL boundary at Harrodian School in Barnes. However, in light of the strong policy support for education provision, and the strategic policy conflict between DM OS2 (MOL) and CP18 (Education), we recommend that a focused review is undertaken of the boundary at LEHS.

We suggest that, where a clear need can be demonstrated, alternative sites are deemed inappropriate for development, and the land designated as MOL does not serve its purpose, there is a planning case to justify the release of that part of the MOL designation for education-related development.

There is strong policy support for the expansion of education facilities, and an established need for the development of education facilities at LEHS. Further, the quantity of land we propose for exclusion from the MOL designation at LEHS makes a minimal contribution to MOL.

The proposed amendment to the existing MOL designation at LEHS is shown on the Proposed Amended MOL Designation Plan, attached to this letter. The amendment concerns a piece of land towards the south east corner of the school site, near Hanworth Road. Its development for education purposes would not have an adverse impact on the openness of the MOL and, in addition, would positively contribute to the objectives of Policy CP18.

The release of the land from the MOL designation for education purposes would not have a significant adverse impact on the openness of the MOL and would positively contribute to the objectives of Policy CP18, going some way to help reconcile the strategic policy conflict that exists between CP18 and DM OS2.

Whilst our preference is for the removal of this land from the MOL designation, we would also recommend the addition of a clause to Policy DM OS2 to allow an exception for education uses where it can be demonstrated that a need for the expansion of education facilities exists, and there is no conflict with the openness of the MOL. For example:

'Where need can be demonstrated for the expansion of an education facility, and there is no reasonable alternative location for that facility, the development proposal will be treated as very special circumstances'.

## **Conclusion**

In a context of increasing pressure on school places, and strong policy support for the development of education facilities (that does not distinguish between state-funded and independent school places, but favours greater diversity in the nature of supply), we recommend that the Council's assessment of local need should address the increasing need for both state-funded *and* independent school places. Policy CP18 should be revised to plan positively for *all* school places, including independent schools.

Since the majority of the Lady Eleanor Holles School site is designated as MOL, and therefore subject to the protectionist policies referred to above, there is a strategic policy conflict between the pro-development policies relating to education facilities, and the protection of MOL.

We recommend that this policy conflict be reconciled either by reviewing the MOL boundary at Lady Eleanor Holles School, or by adding an exception clause to policy DM OS2.

We would welcome the opportunity to continue discussions on LEHS's plans, and their proposals to accommodate further school places, through a meeting with officers. Please do not hesitate to contact Tim Sturgess or me to discuss further.

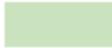
Yours faithfully

**Rebecca Doull**  
**Planner**  
**For and on behalf of GVA Grimley Limited**

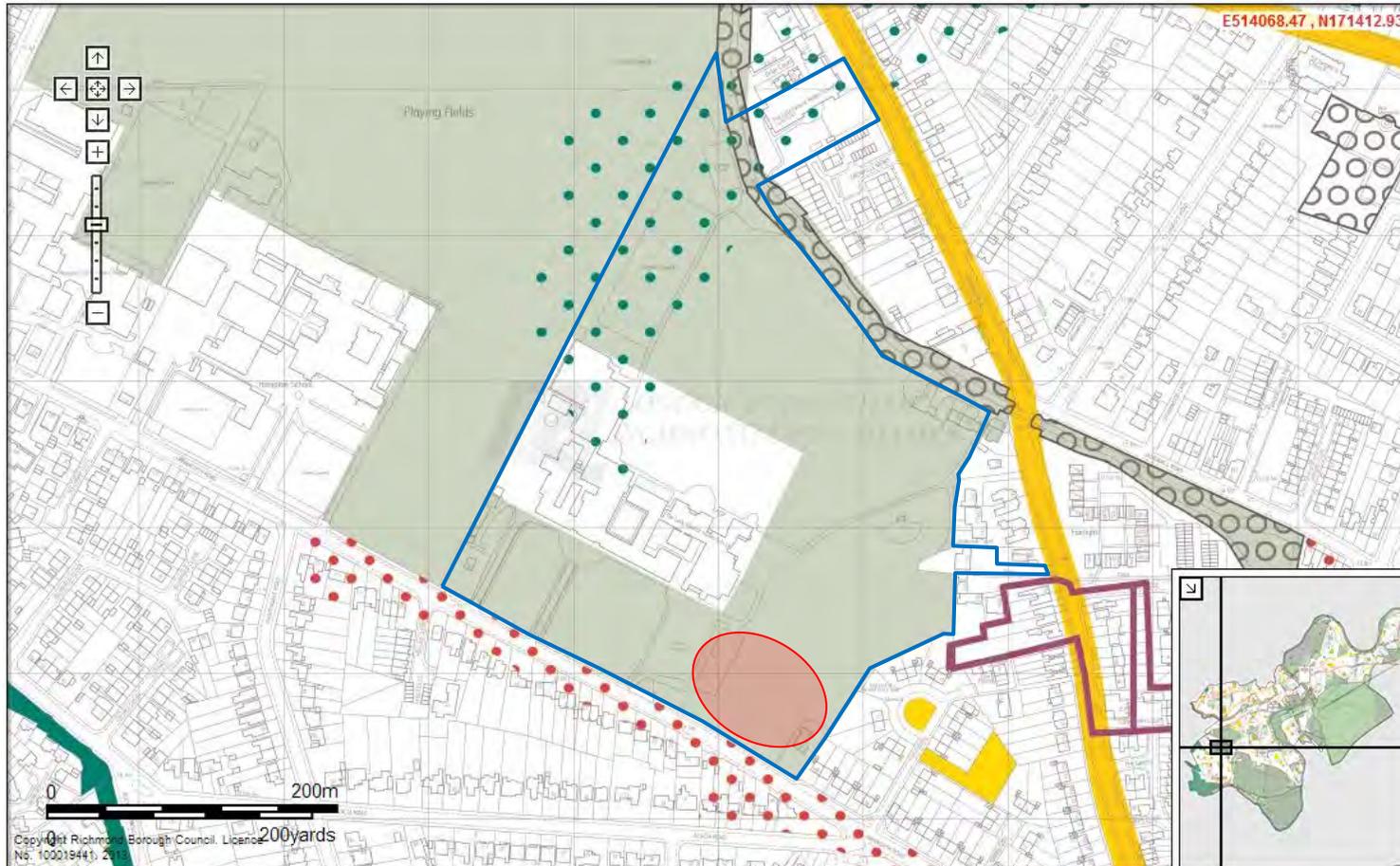
# Core Strategy (2011) Proposals Map Extract



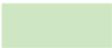
## Key

-  Metropolitan Open Land
-  Area poorly served with Public Open Space
-  Proposed area for tree planting
-  Other site of nature importance
-  Conservation Area
-  Other open land of townscape importance

# Proposed Amended MOL Designation Plan



## Key

-  Proposed area to remove from Metropolitan Open Land
-  Metropolitan Open Land
-  Area poorly served with Public Open Space
-  Proposed area for tree planting
-  Site boundary

## Appendix A – Vehicle Crossovers Guidance for Applicants

### Transport for London (TfL) Vehicle Crossovers Guidance for Applicants (Highways Act 1980, Section 184)

#### 1 General

1.1 The purpose of this guidance note is to provide general information to assist applicants when requesting TfL to construct a vehicle crossover on the Transport for London Road Network (TLRN).

1.2 It is an offence to allow a vehicle to cross a footway other than via an approved crossover.

1.3 The Highways Act 1980 enables a highway authority (TfL in this case) to construct a vehicle crossover at an applicant's expense. For safety reasons, it is neither permissible for applicants to carry out the crossover works themselves nor to arrange for others other than TfL to carry out the highway works on their behalf.

1.4 Consent for a crossover must be obtained from two authorities:

- TfL as highway authority
- and
- The relevant planning authority for the area

Please note that consent from either authority does not in any way imply consent from the other. Consent from both must be obtained before a crossover can be constructed.

1.5 TfL considers each application for a vehicle crossover on its merits (see section 5 below for some of the factors taken into account).

**Please be aware that an application for a vehicle crossover may be refused.**

- 1.6 If TfL agrees to construct a crossover, the works carried out by TfL will be limited to the construction of the crossover and any associated work in the highway. It is the responsibility of the applicant to complete any work necessary to construct an acceptable parking area, remove walls etc. within his/her property boundary. Such work must not be started before TfL and the relevant planning authority have been consulted (see 2 below).
- 1.7 Construction by the applicant of the off-street parking area must be completed before TfL will commence works to construct the new crossover.

## 2 **Planning consent**

- 2.1 In addition to TfL's agreement (as highway authority) to construct a crossover on the highway, planning consent from the relevant planning authority is required for new or wider access to a TfL road, and may be required for certain works carried out by the occupier to his/her property.
- 2.2 The applicant is responsible for obtaining any required planning consent. Planning applications must be made to the planning authority before any work is started on the property.
- 2.3 **Before any works can be started on the crossover, TfL will require a copy of the planning consent, or a letter from the planning authority stating that planning permission is not required.**

## 3 **Permitted Vehicles**

A domestic vehicle crossover may only be used by a private, light goods or similar vehicle. It may not be used by heavy goods vehicles or mechanical equipment. The occupier is responsible for the costs of repair if the crossover or adjacent footway is damaged by such use which s/he has permitted.

#### 4 **Site inspection**

After the application has been received, an engineer representing TfL will inspect the proposed crossover site. The engineer may advise the applicant of any circumstances that might constitute a danger to road users such as walls or fences that impair visibility or a location that is too close to a junction. The engineer may suggest ways to improve visibility or otherwise make an application more likely to be acceptable.

#### 5 **Assessing an application**

5.1 An application will not be approved unless TfL is satisfied that the matters set out below have been properly addressed. This list is not exhaustive and an application may be rejected for reasons not indicated below.

- a) Safety of vehicle traffic and pedestrians.
- b) The volume and speed of traffic on the adjoining highway.
- c) Adequacy of sightlines between vehicles using the crossover and other users of the highway, including pedestrians.
- d) Whether the property has a parking area completely within the property boundary of sufficient size to allow vehicles using the crossover to both access and leave the property in a forward gear.
- e) Any need to remove a tree from the TfL Road Network.
- f) Any need to remove a loading or parking box that could not easily and safely be relocated.
- g) Whether the proposed location is one where use of the crossover would interfere with, or be hazardous to, bus movement or a bus stop.
- h) Whether the proposed location is less than 10 metres from a road junction.
- i) Whether the proposed crossover would interfere with a pedestrian crossing or require the removal of a pedestrian guard-rail.
- j) Whether the property already has access for vehicles.
- k) The Road Network Management Plan for the location and the possibility that footway enhancement or other potential changes to the highway may be incompatible with the provision of a crossover

(e.g. a need to site a bus stop or essential street furniture at or near the location).

## 6 **Dimensions, materials etc**

### 6.1 Crossover

- a) For domestic applications the recommended width of a crossover is 2.7m, to 3.6m. For double domestic access, the maximum width is 8.1m.
- b) The materials used will vary according to the location and will be determined by TfL.

### 6.2 Parking area

- a) In order for a domestic vehicle to meet the requirement to enter and leave the property in forward gear, a minimum unobstructed area of 10m x 8m within the property boundary is likely to be required. Whilst it is not necessary for the turning manoeuvre to be completed by means of a 'three point turn' the number of points in the manoeuvre must be reasonable. The engineer will assess such matters during the site visit.
- b) It is not advisable to use a loose gravel surface for the off-street parking area as it is prone to be carried onto the footway/carrageway and pose safety problems for pedestrians, disabled persons and motorists. Gravel or shingle rolled into asphalt is an acceptable alternative.
- c) No part of a vehicle parked on the property may project onto or over the highway (pavement/verge).
- d) The crossover may not be used as a parking area.
- e) Gates may not open outwards on to or over the footway.

## 7 **Costs**

7.1 The applicant is responsible for paying all costs associated with the construction of the crossover. These include, but are not limited to:

- a) Crossover construction costs.
- b) Costs of utility companies relocating any utility apparatus lying within the perimeter of the crossover (for example a lamp column too close to the crossover). The applicant pays the cost of this work to TfL who

will arrange to have it done. Relocation of utilities' apparatus must be complete before the crossover can be constructed.

- c) All costs associated with any amendment to, or new Traffic Regulation Orders.

**8 Quotation**

If TfL agrees to construct a crossover, a quotation for the works will be prepared. The cost of relocating any lamp columns, signs, or special measures needed to protect underground mains and cables, or amendments to Traffic Regulation Orders will be included in the quotation. The quotation is open to acceptance for a period of three months. Payment in full is required before construction work can begin.

**9 Ownership and maintenance**

The crossover is part of the public highway. TfL assumes responsibility for its maintenance at no cost to the occupier other than for damage caused by inappropriate use (e.g. heavy vehicles).

**10 Further Advice**

The Principal Engineer or Development Planning Officer with responsibility for the area will be pleased to discuss potential applications and offer general advice at an early stage.

**End of document**

**Appendix B**

**Transport for London  
Permanent Vehicle Footway Crossover  
Application  
(Highways Act 1980, Section 184)**

Notes:

- a) Please read the accompanying 'Vehicle Crossovers Guidance for Applicants' before completing this form.
- b) Please be aware that there are certain circumstances where a crossover is not permitted, so this application may be refused.

Applicant:

Address:

Contact telephone:

Fax number:

Site address to which crossover is required:

I/We require the following class of crossover (delete the one not required)

- a) Domestic: to a single dwelling, not suitable for heavy vehicles such as refuse collection vehicles, skips, etc.
- b) Development: to multiple dwellings or for use by heavy vehicles.

I/We enclose plan or sketch showing the desired location and size of the crossover.

I/We enclose copy of the *Planning Permission* or *Certificate of Lawfulness* obtained from the local planning authority.

Signature

Date

**End of document**

SQA-0096

3.20.5 Continuous analysers monitor air quality in the borough 24 hours a day; currently the Council has one mobile monitoring unit that is moved around the borough to different locations and two static units (one is located in Castelnau outside the Public Library and the other is at the Wetlands site in Barnes). The diffusion tubes measure and monitor NO<sub>2</sub>; these are located at a number of sites throughout the borough. The two figures below show the measured NO<sub>2</sub> results in this borough for the year 2011. (Note that two charts are required due to the number of monitoring locations.) For historical NO<sub>2</sub> data and previous years monitoring result, please see: [http://www.richmond.gov.uk/nitrogen dioxide results diffusion tube sampling.htm](http://www.richmond.gov.uk/nitrogen%20dioxide%20results%20diffusion%20tube%20sampling.htm)

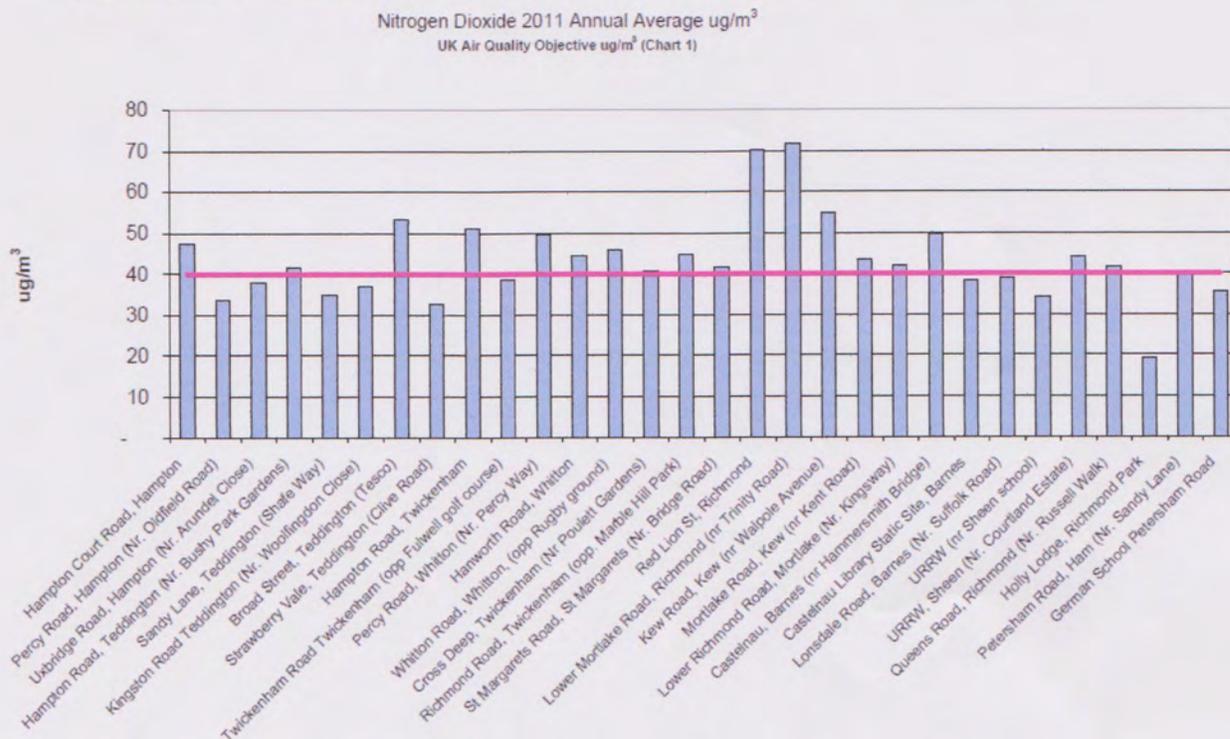
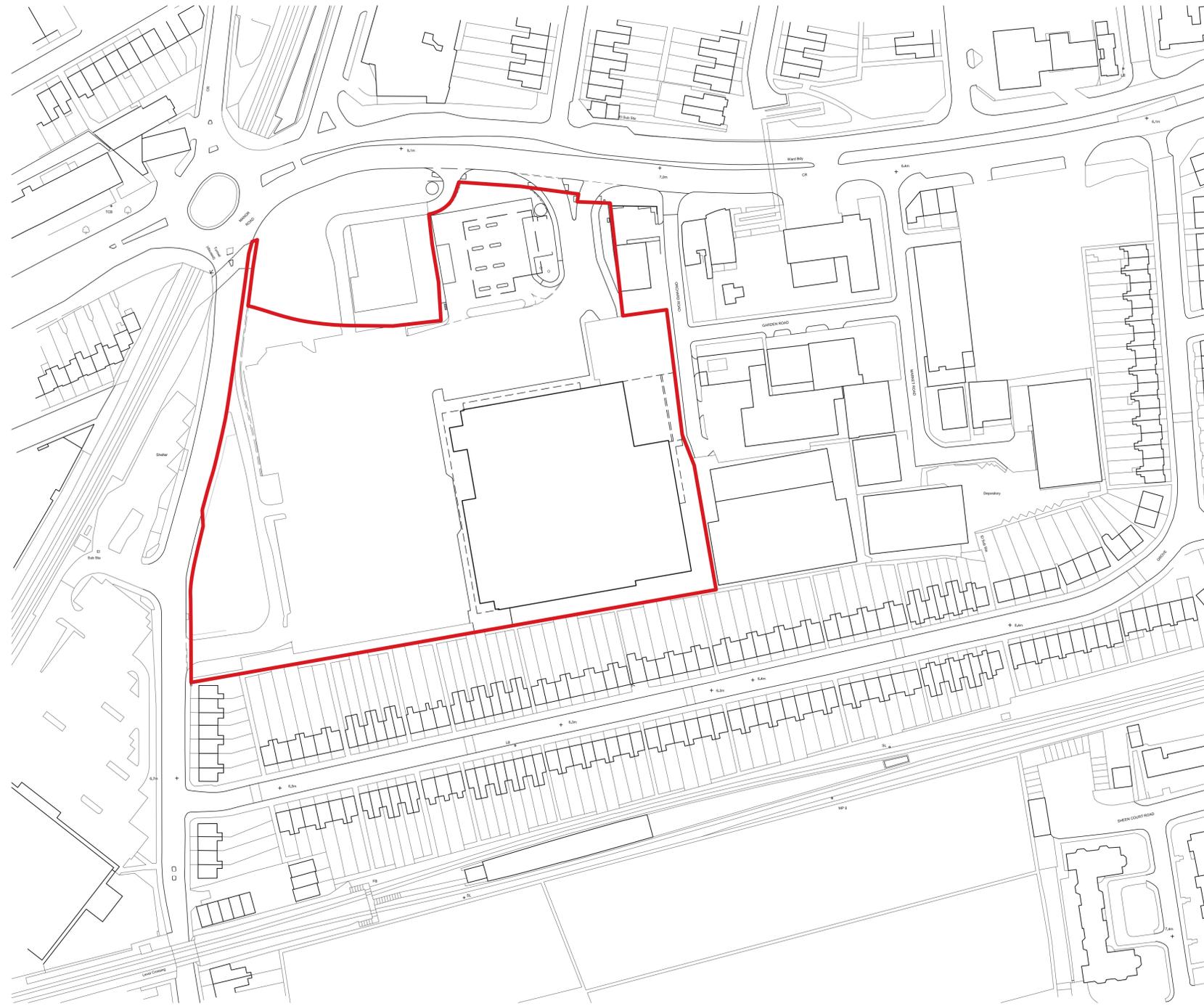


Figure 18: Chart 1 – LBRuT Nitrogen Dioxide 2011 Annual Average ug/m 3

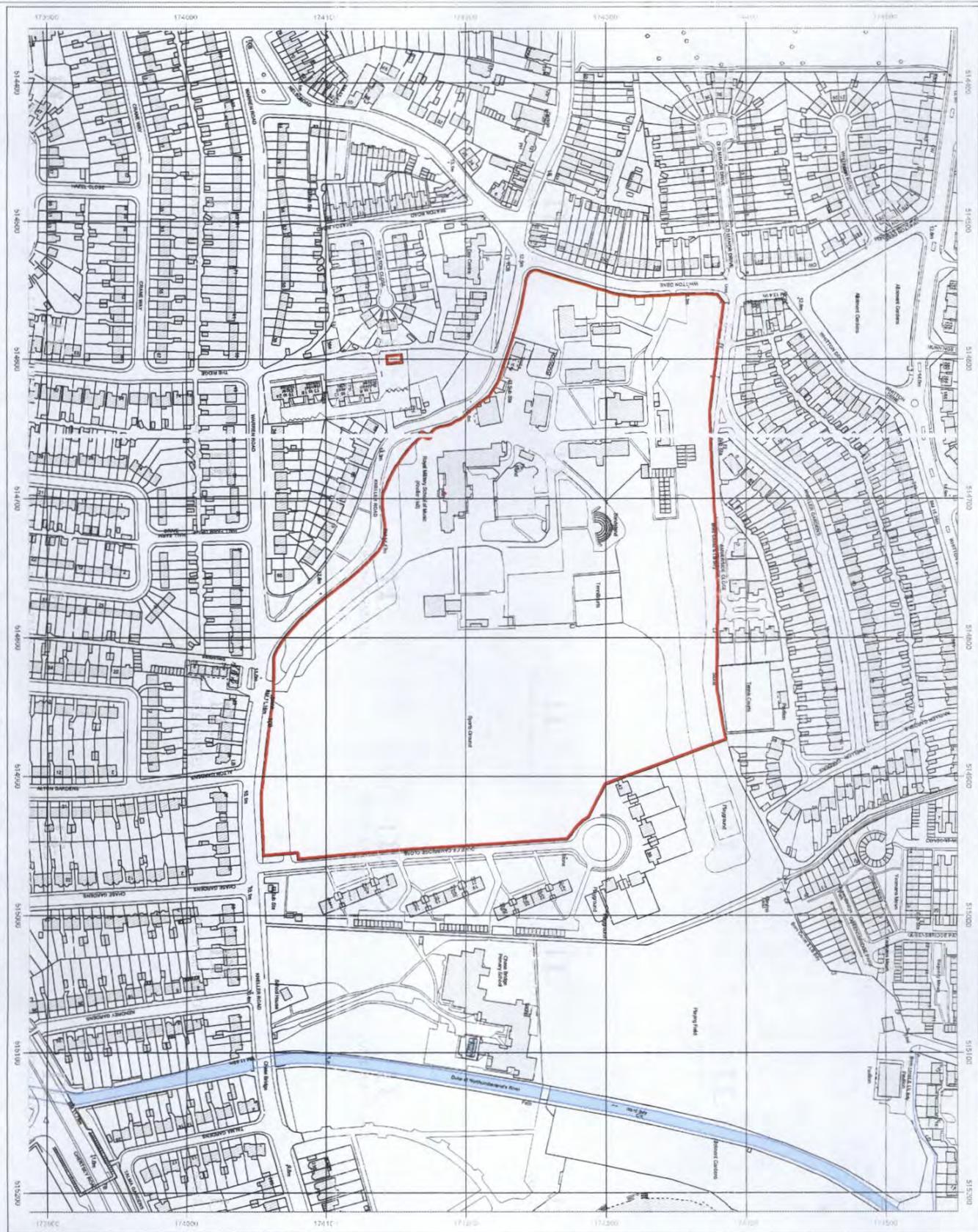


Key — Site boundary

<b>Project</b>	Manor Road, Richmond	<b>LPA</b>	LB Richmond upon Thames	<b>Indigo Planning Limited</b> Sween Court Worple Road London SW19 4JS
<b>Title</b>	Site location plan	<b>Date:</b>	01.02.16	 T 020 8605 9400 F 020 8605 9401 info@indigo-planning.com
<b>Client</b>	Sainsbury's Supermarkets Ltd	<b>Scale:</b>	1:100000A1	
		<b>Project No:</b>	20870002	
		<b>Drawing No:</b>	20870002/01	
		<b>Drawn By:</b>	TH	







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**KNELLER HALL**  
 TWICKENHAM

Scale 1:2,500

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Version Number:  
 Production Date:  
 Drawn By:  
 Checked By:  
 Date of Issue:

  
**DEFENCE ESTATES**  
**GEOSPATIAL SERVICES SOUTH**  
 BUILDING 52, WESTDOWN CAMP  
 TWICKENHAM, MIDDLESEX TW9 3AS  
 E MAIL:



SITE 0165

# Official copy of register of title

Title number TGL368009

Edition date 11.09.2012

- This official copy shows the entries in the register of title on 3 October 2012 at 17:14:37.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 3 October 2012.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- For information about the register of title see Land Registry website [www.landregistry.gov.uk](http://www.landregistry.gov.uk) or Land Registry Public Guide 1 - *A guide to the information we keep and how you can obtain it.*
- This title is dealt with by Land Registry Telford Office.

## A: Property register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (11.09.2012) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Land at Kneller Hall, Kneller Road, Twickenham.

NOTE: As to the highways included in this title the surface and subsoil (if any) forming part of a highway maintainable at public expense is excluded from the registration.

- 2 (11.09.2012) The land has the benefit of the rights reserved by but is subject to the rights granted by a Transfer of other land dated 27 May 2002 made between (1) The Secretary Of State For Defence and (2) Annington Property Limited.

NOTE: Copy filed under TGL203654.

## B: Proprietorship register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

### Title absolute

- 1 (11.09.2012) PROPRIETOR: SECRETARY OF STATE FOR DEFENCE care of Defence Infrastructure Organisation, Blandford House 5 Farnborough Road, Aldershot, Hampshire GU11 2HA.

## C: Charges register

This register contains any charges and other matters that affect the land.

- 1 (11.09.2012) The parts of the land affected thereby are subject to the rights granted by a Lease of an electricity sub-station dated 14 December 1962 referred to in the schedule of leases hereto.
- 2 (11.09.2012) The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.  
The leases grant and reserve easements as therein mentioned.

## Schedule of notices of leases

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
1	04.02.1963	An electricity sub-station on the northeast side of Kneller Road	14.12.1962 99 years from 29 September 1962	MX451028

NOTE: See entry in the Charges Register relating to the rights granted by this lease

End of register

# Appendix 1

Mayor of London Office for Policing and Crime

Disposal of Buildings with effect from 1<sup>st</sup> April 2014

March 2015

**DISPOSAL OF BUILDINGS WITH EFFECT FROM 1 APRIL 2014**

<b>Name of site disposed of</b>	<b>Address &amp; Postcode</b>	<b>Borough</b>	<b>Date of sale completion</b>	<b>Value of sale, £'000</b>	<b>Purchaser name and description</b>	<b>Expected new use</b>	<b>Public Access Prior to Closure (Y/N)</b>
Highgate Police Station	407-409 Archway Road London N6 4NW	Haringey	28/04/14	3,575	Bellway Homes Limited	Residential	N
Barking Police Station	6 Ripple Road, Barking IG11 7PE	Barking	30/04/14	925	Resco Investments Limited	Residential	Y
Wealdstone Police Station	74 High Street Wealdstone HA3 7AF	Harrow	30/05/14	950	Meso Investment LLP	Residential	N
Marylebone Police Station	1-9 Seymour Street London W1H 7BA	Westminster	22/04/14	3,000	Seymour Street Nominees Limited & Berkeley Street Nominees Limited c/o The Portman Estate	Mixed use redevelopment	Y

March 2015

**DISPOSAL OF BUILDINGS WITH EFFECT FROM 1 APRIL 2014**

<b>Name of site disposed of</b>	<b>Address &amp; Postcode</b>	<b>Borough</b>	<b>Date of sale completion</b>	<b>Value of sale, £'000</b>	<b>Purchaser name and description</b>	<b>Expected new use</b>	<b>Public Access Prior to Closure (Y/N)</b>
Tabor Grove	22 Tabor Grove Wimbledon SW19 4EB	Merton	30/05/14	1,635	Southpoint Capital Limited	Residential/office	N
Hampstead Police Station	26 Rossllyn Hill London NW3 1PD	Camden	05/06/14	14,105	The Secretary of State for Communities and Local Government	Education	Y
West Drayton Police Station	Station Road Hillingdon UB7 7JQ	Hillingdon	11/07/14	2,200	Area Estates Limited	Residential	N
Chalk Farm Garage	5-17 Haverstock Hill London NW3 3NN	Camden	18/07/14	2,000	Cambridge Gate Properties Limited	Residential/retail	N
Sydenham Police Station	179 Dartmouth Road London SE26 4RN	Lewisham	30/07/14	1,455	Sydenham PS Limited	Residential	Y

March 2015

**DISPOSAL OF BUILDINGS WITH EFFECT FROM 1 APRIL 2014**

<b>Name of site disposed of</b>	<b>Address &amp; Postcode</b>	<b>Borough</b>	<b>Date of sale completion</b>	<b>Value of sale, £'000</b>	<b>Purchaser name and description</b>	<b>Expected new use</b>	<b>Public Access Prior to Closure (Y/N)</b>
Norbury Police Station	1516 London Rd. Norbury SW16 4ES	Croydon	30/07/14	940	Norbury PS Limited	Residential	Y
Beck House Flats 1-6	36 Copers Cope Road Beckenham BR3 1NH	Bromley	18/09/14	2,595	Enfield High Street (AGG9) Limited	Residential	N
Conifer House Flats 1-9	44 Southend Road Beckenham BR3 1SL	Bromley	18/09/14	3,110	Enfield High Street (AGG10) Limited	Residential	N
Claygate House	Manor Road Woodford Green IG8 8BX	Redbridge	24/09/14	1,410	Goddard Veterinary Group	Veterinary/Residential	N
Finchley Police Station	193 Ballards Lane Finchley N3 1LZ	Barnet	09/10/14	5,500	Fizzy Finchley LLP	Residential	N

March 2015

**DISPOSAL OF BUILDINGS WITH EFFECT FROM 1 APRIL 2014**

<b>Name of site disposed of</b>	<b>Address &amp; Postcode</b>	<b>Borough</b>	<b>Date of sale completion</b>	<b>Value of sale, £'000</b>	<b>Purchaser name and description</b>	<b>Expected new use</b>	<b>Public Access Prior to Closure (Y/N)</b>
Phase 1 Hendon	Peel Centre Aerodrome Road Hendon	Barnet	03/10/14	40,000	Redrow Homes Ltd.	Residential	N
St. Ann's Road Police Station	289 St. Ann's Road South London N15 5RD	Haringey	21/10/14	3,400	Citystyle Living (St. Ann's) Limited	Residential	N
Nightingale Lane	3-5 Nightingale Lane Clapham London SW4 9AF	Wandsworth	12/12/14	30,100	Nightingale Lane Planning Company Limited	Retirement Housing	N
Drummond Crescent	1-39 Drummond Crescent Euston London	Camden	17/12/14	12,900	London and Continental Railways Limited	Education	N
Woolwich Police Station	29 Market Street London SE18 6QR	Greenwich	23/12/14	2,202	Woolwich Arsenal Investments Limited	Residential	Y

March 2015

**DISPOSAL OF BUILDINGS WITH EFFECT FROM 1 APRIL 2014**

<b>Name of site disposed of</b>	<b>Address &amp; Postcode</b>	<b>Borough</b>	<b>Date of sale completion</b>	<b>Value of sale, £'000</b>	<b>Purchaser name and description</b>	<b>Expected new use</b>	<b>Public Access Prior to Closure (Y/N)</b>
Hampton Traffic Unit	60-58 Station Road Hampton TW12 2AX	Richmond	07/01/15	5,403	Pinnacle Hampton Station LLP	Residential	N
Streatham Police Station	101 Streatham High Road Streatham London SW16 1HJ	Lambeth	26/02/15	4,249	BBL Estates Limited	Residential	Y
Kenley Police Station	94-96 Godstone Road Kenley CR8 5AB	Croydon	20/02/15	600	Sky Heart Limited	Office	Y
Rigg Approach	12 Rigg Approach Lea Bridge Road Leyton E10 7QN	Waltham Forest	03/03/15	1,880	Fitzrovia Capital Limited	Warehouse / workshop	N
South Bank Flats 1-9	347 Grange Road South Norwood SE19 3BU	Croydon	17/03/15	1,700	The Mayor & Burgesses of the London Borough of Croydon	Residential	N

March 2015

**DISPOSAL OF BUILDINGS WITH EFFECT FROM 1 APRIL 2014**

<b>Name of site disposed of</b>	<b>Address &amp; Postcode</b>	<b>Borough</b>	<b>Date of sale completion</b>	<b>Value of sale, £'000</b>	<b>Purchaser name and description</b>	<b>Expected new use</b>	<b>Public Access Prior to Closure (Y/N)</b>
Griffiths Road Flats 1-9	30 Griffiths Road Flats 1-9 Wimbledon SW19 1SP	Merton	31/03/15	4,594	GML Griffiths Road Limited	Residential	N
Land at Kings Place	Land off Kings Place to the rear of 325 Borough High Street SE1 1JL	Southwark	31/03/15	401	Wimpole Homes Limited	Residential	N
Pan London Residential	Various	Various	Various	7,271	Various	Residential	N

Please note - sale terms may include provision for planning overage and/or sales overage which may result in payment to MOPAC in addition to the initial contractual purchase price shown above.

# WFD Water Body Summary

## Crane Water Body



Crane catchment

October 2015

The Crane water body is 13.7 km in length. It flows from the point where the Yeading Brook becomes the Crane (at the southern end of Minet Country Park) to the tidal limit of the Thames.

### Environmental status

Our monitoring shows that the river does not have healthy populations of fish, invertebrates, aquatic plants or microscopic algae. We also found phosphate levels are too high to support a healthy ecology in the river. These environmental issues mean that the river fails to meet Good Ecological Status under the Water Framework Directive and is rated as Poor.

	Reported in 2015 River Basin Management Plan
<b>Ecological Status</b>	<b>Poor</b>
Fish	Poor
Invertebrates	Moderate
Plants and algae	Moderate
Phosphate	Poor

### Issues affecting the Crane

#### Physical modification

Modifications to the river in urban areas have changed the habitat, making it unsuitable for healthy ecology. These include: barriers in the river (e.g. weirs), flood protection structures, artificially reinforced banks, and sections that have been straightened and made too wide and too deep. Mereway weir in Twickenham is a significant barrier preventing fish migration into the Crane. These physical modifications designed to drain the water from the surrounding urban areas can lead to a rapid onset of floods at times of high rainfall, flushing invertebrates and plants downstream. There are no refuge areas (flooded banks, wetlands and backwaters) to recover.

#### Urban runoff and road runoff

Urban and road runoff contributes to up to 20% of phosphate in the Crane. Sources of phosphate from urban drainage include decomposing leaves and debris, animal faeces from roads and parks, verge erosion and drainage of detergents used for car washing and house maintenance.

#### Sewage and foul water discharge

Misconnections within drainage pipes, along with occasional sewer blockages, act as a source for 20-40% of phosphate levels within the Crane.

**Water Body Name:** Crane **Water Body ID:** GB106039023030

**Catchment Co-ordinator:** Amanda MacLean **E-mail:** amanda.maclean@environment-agency.gov.uk

There are three combined sewer overflows and eight sewage pumping stations with emergency overflows in the catchment. These are permitted for times of high flow and contribute up to 20% of phosphate levels. These elevated phosphate levels are impacting on the health of the ecology.

### **Sewage treatment work discharges**

Maple Lodge Sewage Treatment Works in the adjacent Colne catchment discharges into the Upper Duke of Northumberland's River, contributing to the high levels of phosphate (40-60%) in the Crane, downstream of the confluence. Due to limited technologies, the treated discharges currently contain levels of phosphate which are higher than Water Framework Directive standards and impact ecology. By 2027 measures and technology should be in place to meet the Water Framework Directive standards.

### **Pollution incidents**

The Crane has suffered from some significant pollution incidents in recent years, with two major events in 2011 and 2013, which has impacted the ecology.

### **De-icers**

De-icers such as glycol are used as a safety measure for aeroplanes during periods of cold weather. When they get into the River Crane they have been shown to impact invertebrate populations.

### **Flow**

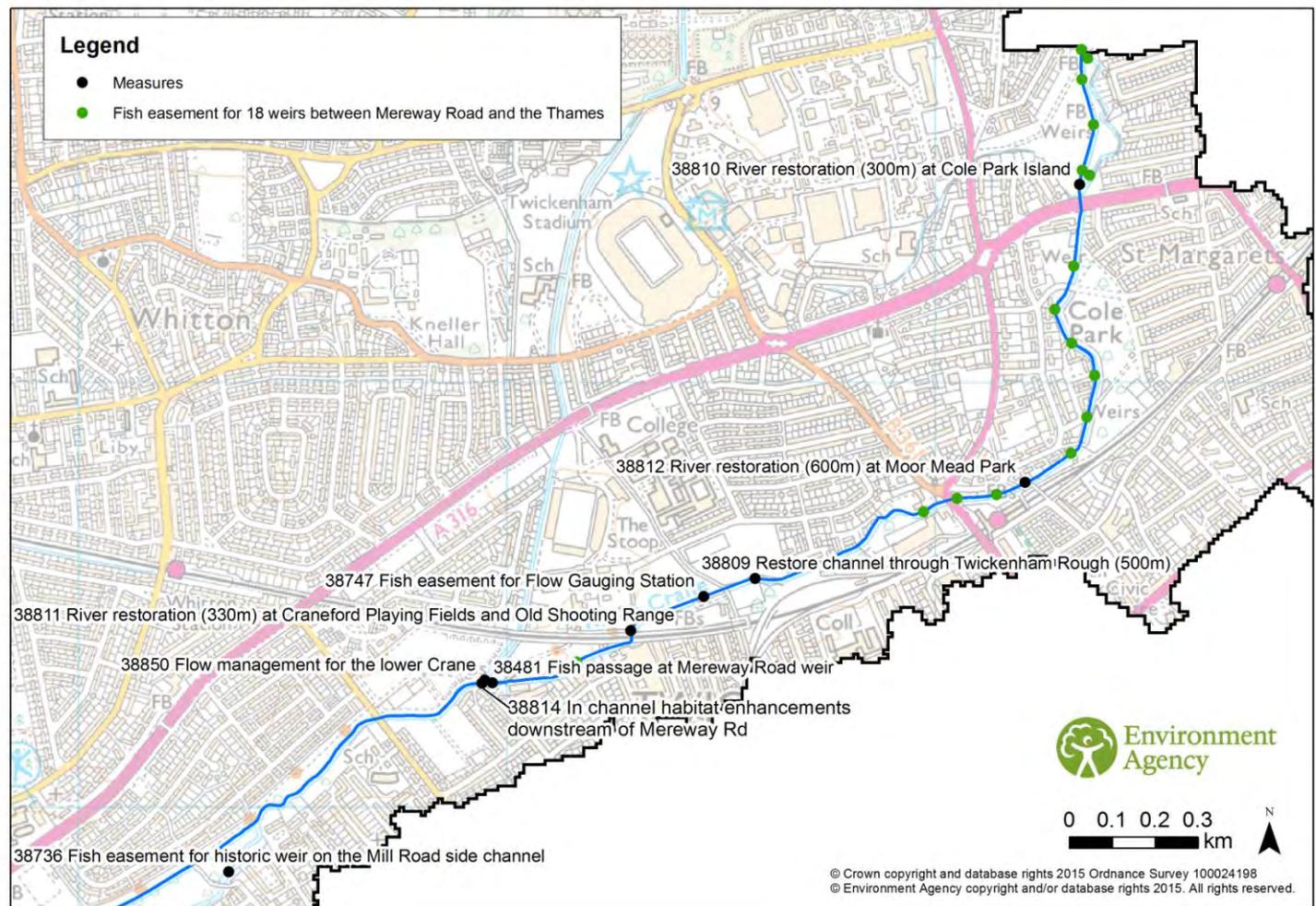
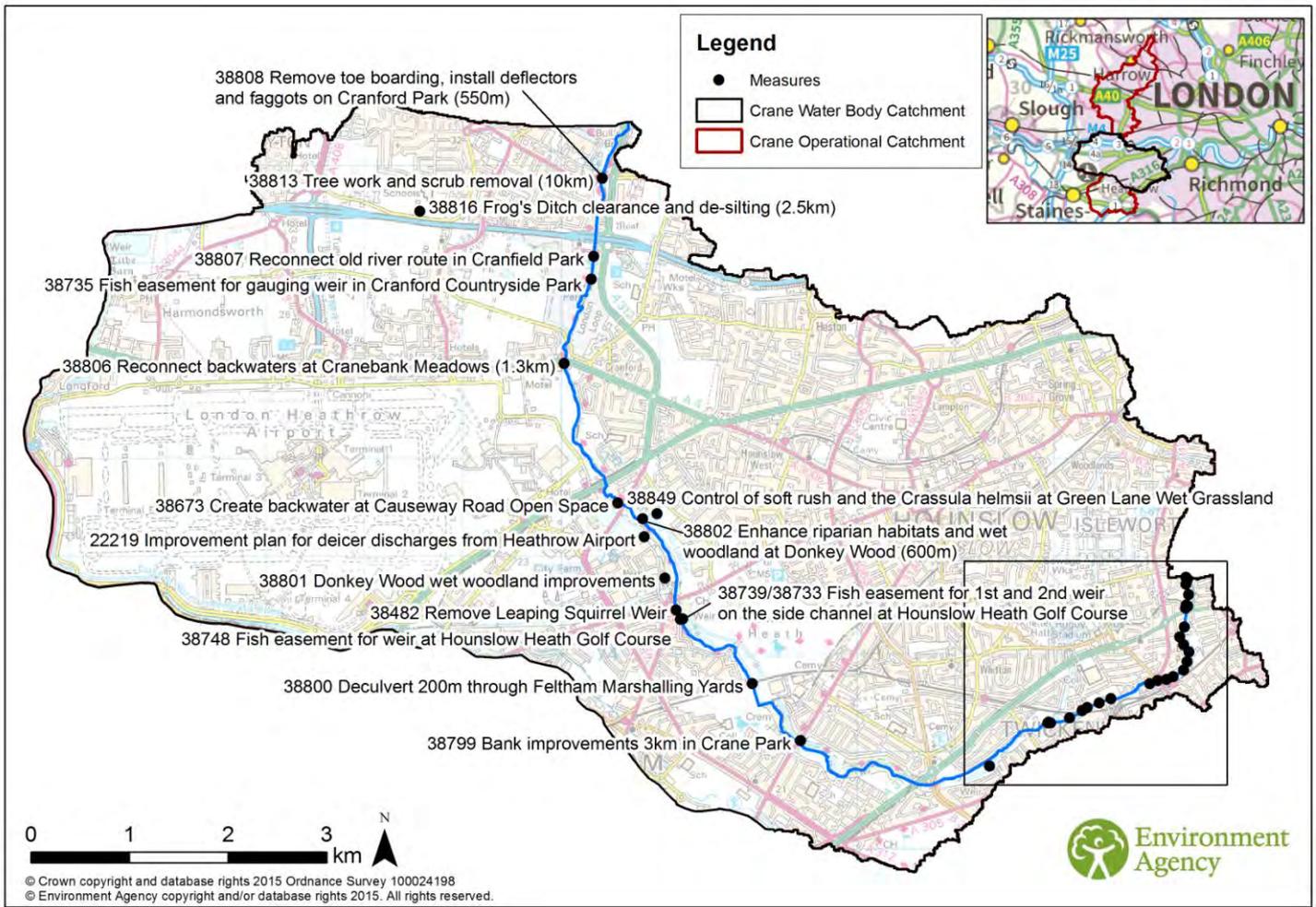
During drier periods most of the river flow is diverted down the Duke of Northumberland's River at Twickenham. This leaves the lower reaches of the Crane with too little flow.

### **Proposed measures for the Crane water body**

We have identified measures that will help to achieve Good Ecological Status in the River Crane. The maps below show some of the measures we consider are necessary at specific locations. When a measure extends along a reach of the water body, the length downstream of the mapped point is specified. Where specific locations do not apply, these are listed as water body wide measures. We need to work together with partners, local people and landowners to refine, agree and implement these measures to achieve improvements.

### **Proposed water body wide measures**

- 21923 'Only Rain in Rivers - Be a Solution to Water Pollution' campaign
- 22149 Assess and improve or remove CSOs
- 22153 Misconnections rectification for priority Polluted Surface Water catchments
- 22158 Coordinated Pollution Prevention/Hazardous Waste inspections of businesses
- 22167 Misconnections rectified by householders
- 22176 Assess and improve highway runoff management
- 38580 Fish restocking programme
- 38671 End-of-pipe pollution absorbent systems for outfalls
- 38672 Promote and install SUDS
- 38803 In-channel habitat enhancements and other works to be identified
- 38805 Publicity drive on riparian owners' responsibilities, lower Crane



For more information on the Water Framework Directive or the terms used in this document please see our accompanying explanation and glossary



# TE2100 Local Council Briefing Document – London Borough of Richmond

April 2015



**TE2100 Key Products - Data Quality Insert**

**Product Name and Number:**

TE2100\_P461\_Local Council Tailored Briefings

**Study Name:**

Local council tailored briefings

**TE2100 Phase:**

Implementation

**Study Ref:**

**Product Type:**

Report

**Date:**

01/04/2015

**Concluding Quality Statement:**

These briefings utilise existing information from TE2100 studies, there is no new information included

**Significance:**

8 - High

**Technical Reliability:** High

**Best available or superseded:** Best available

**Contribution to TE2100:**

Sarah Lavery, TE2100 Project Manager

## TE2100 Local Council Briefing Document – London Borough of Richmond

### Purpose of this briefing

This briefing document is intended to help explain the Thames Estuary 2100 (TE2100) Plan requirements for tidal flood risk management in the London Borough of Richmond and to provide ideas on how flood risk management can be integrated with other objectives to deliver a well-planned riverside.

### Key messages

- Local councils are key partners in helping the Environment Agency to deliver the TE2100 Plan; ensuring that the Thames tidal defence system continues to provide protection for communities and the economy now and into the future.
- You can help us by including TE2100 requirements for flood defence improvements, opportunities for improving the riverside and by safeguarding land for future flood management in strategic planning documents such as local plans.
- This briefing contains information on the TE2100 Plan and suggested key policy messages for you to include in strategic planning documents. If you have any questions or would like further information contact details for a member of our local Sustainable Places team are provided.

### The TE2100 Plan

The TE2100 Plan covers the Thames estuary from Teddington in the west to the mouth of the estuary at Shoeburyness (north bank) and Sheerness (south bank). It provides a plan for improving the tidal flood defence system for the period to 2100 so that current standards of flood protection are maintained or improved taking account of sea level rise.

The TE2100 Plan divides the floodplains of the tidal Thames into 23 separate policy units. These are generally independent flood cells, where tidal flooding could occur from overtopping or failure of defences in the policy unit but not from adjacent policy units. The policy units are grouped into 8 action zones. There is also an estuary-wide action zone (zone 0).

The London Borough of Richmond contains the TE2100 Richmond policy unit, most of the Barnes and Kew policy unit and part of the Twickenham policy unit. Figure 1 shows the council area and the policy units. The western boundary of the council area on the Thames runs along the River Crane and the eastern boundary on the Thames runs along the Beverley Brook.

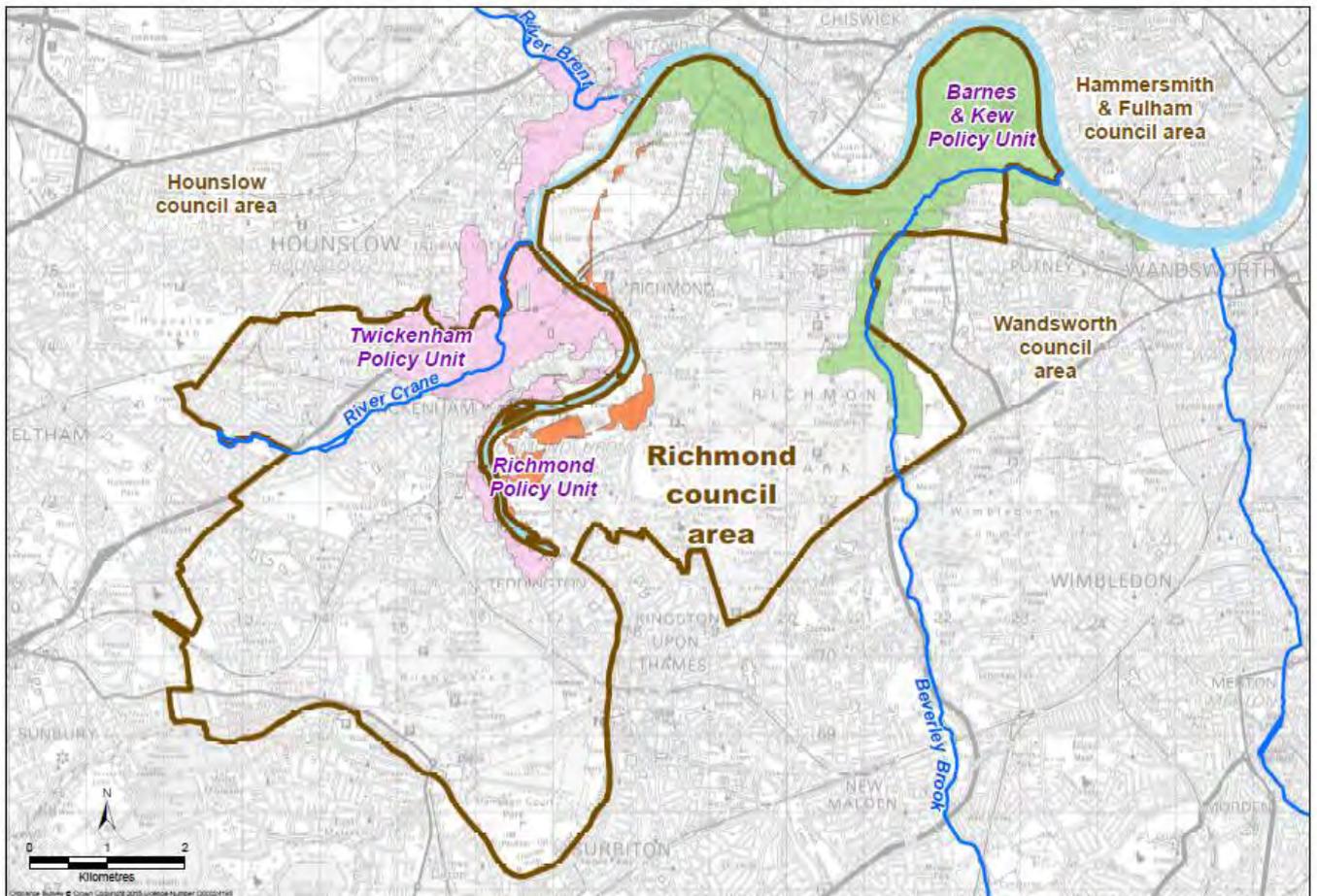


Figure 1: The London Borough of Richmond and TE2100 policy unit

The flood risk management policy set out in the TE2100 Plan for Richmond is as follows:

- **Barnes** and **Kew** policy unit and **Twickenham** and **Richmond** policy units (tidal flooding only): 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.

The reason that Twickenham and Richmond policy units must have a P5 Policy for tidal flooding is that the TE2100 Plan will allow higher water levels upriver of the Thames Barrier on a regular basis. 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.

- **Twickenham** and **Richmond** policy units (fluvial flooding): Policy P3, **continue with existing or alternative actions to manage flood risk accepting that the likelihood of flooding will increase because** of climate change.

Specific actions in the TE2100 Plan that refer to the London Borough of Richmond are as follows:

- To agree a programme for alternative measures to manage fluvial flood risk in west London within 25 years.
- To maintain, enhance or replace the existing river defence walls/banks and flood control structures;
- To incorporate the Riverside Strategy concept into local plans, strategies and guidance documents;

- To agree a programme of floodplain restoration and management;
- To agree a programme of managing flooding from other sources in the defended tidal floodplain;
- To inform the development and revision of local council strategic flood risk assessments (SFRAs) and flood plans;
- To agree partnership arrangements and principles to ensure that new development in the tidal flood risk area is safe and where possible applies the NPPF to reduce the consequences of flooding;
- To agree partnership arrangements for floodplain management;
- To agree a programme of floodplain management.

The implementation of flood defence improvements has already commenced under the Environment Agency's Thames Estuary Asset Management (TEAM) 2100 programme. This 10-year programme of asset management is to be delivered by an integrated team led by CH2M HILL and the Environment Agency.

### **TE2100 policy units in the London Borough of Richmond**

The part of Twickenham policy unit in Richmond includes residential areas, parks and gardens, and contains an extensive flood risk area between the River Thames and the River Crane. There are many gardens on the river frontage and public access to the riverside is not continuous.

Eel Pie Island at Twickenham is accessed via a footbridge and contains residential properties and boatyards. The defence crest levels are lower than the main tidal defences and flooding can occur during fluvial events. The island benefits from the current practice of closing the Thames Barrier during fluvial flood events to reduce flood levels in west London.

Richmond policy unit consists of a relatively narrow floodplain along the Thames, much of which is occupied by parks and gardens. The amount of property at risk is small but there are some historic and important sites including Ham House and part of Kew Gardens. There is public access along the riverside for the full length of the frontage, much of which is in the park areas.

High tides flood parts of the riverside including riverside paths, and any changes to the flood management system must take account of the current water level regime which is an important feature of the area. Figure 2 shows high tide in Richmond.



*Figure 2: High tide in Richmond*

The Barnes and Kew policy unit contains residential areas and some important open areas including Kew Gardens and the Barnes Wetland Centre. There is a path along the full length of the frontage which is in front of the flood defence line in some areas. The outfall of Beverley Brook forms the boundary between the London Boroughs of Richmond and Wandsworth on the Thames.

Much of the frontage in the London Borough of Richmond has sloping river banks and there is access to the foreshore in many areas. Whilst some parts of the area have close links with the river, such as Richmond and Twickenham, other areas such as Barnes and Kew make relatively little use of the riverside.

As the flood defences are improved it will be important to ensure that there is collaboration between adjacent council areas on the planning, design and construction of improvements to the flood defences and the riverside. When defences are raised, it is likely that footpaths and other public access will also require raising. Actions involving cross-boundary working between local councils should therefore consider the following:

- A consistent approach to improvements on the River Crane which forms the boundary between the London Borough of Richmond and the London Borough of Hounslow. This includes both the system of flood defences for the River Crane and other riverside improvements in order to create a coherent landscape along the river and the adjacent banks of the Thames.
- A consistent approach to improving the flood defences at the boundary between the London Borough of Richmond and the London Borough of Wandsworth. This should include collaboration on flood management and other improvements to Beverley Brook.

## **TE2100 flood risk management requirements**

**The tidal flood defences in Richmond include the following:**

- Fixed defences on the Thames and the lower reach of the River Crane.
- Smaller fixed defences on Eel Pie Island.

- The Crane gates that prevent high water levels in the Thames entering the River Crane.
- Drainage outfalls with tidal flap gates to prevent flow from the Thames into the drainage systems. These include the Beverley Brook outfall and the two diversion culverts referred to below.
- Richmond and Teddington locks. Whilst not tidal defence structures, these are the river control structures on the Thames in west London.

The tidal flood defences provide protection against the highest water levels that are permitted through the Thames Barrier. Fluvial flooding from the Thames also occurs on the Richmond frontage and the Thames Barrier is currently used to lower water levels during fluvial floods.

There are also fluvial flooding problems on the River Crane and Beverley Brook that are exacerbated by high tidal water levels in the Thames. There are two diversion culverts on Beverley Brook which discharge fluvial flows but these are also affected by tide lock from high tidal water levels.

Richmond is affected by both tidal and fluvial flooding and this interplay is complex. Our River Thames Scheme is now considering options for managing flood risk in the Teddington area, particularly for the vulnerable communities on Thames Ditton and Trowlock Islands.

#### **Future requirements for defences on the Thames are:**

- An ongoing programme of inspection, maintenance, repair and replacement of defences;
- Raising of all defences by up to 0.5m in 2065 for tidal flood protection;
- Raising of all defences by an additional 0.5 m in 2100 for tidal flood protection. This allows for projected increases in sea level to 2135.

The actual dates of defence raising will depend on the rate of sea level rise. These dates may be revised when the TE2100 Plan is updated.

The drainage outfalls into the Thames will also require improvement as the Thames water levels rise and storm rainfall increases, because the discharge of drainage water will become more difficult. Improvements might include enlarging the outfall structures and provision of fluvial flood storage.

### **Cost estimates**

The approximate costs of maintaining and improving the flood defence system for the London Borough of Richmond are as follows for the period to 2050:

Flood defences - maintenance and repair:	£25 million
Flood defences - major repairs and replacements:	£145 million
Thames barrier (contribution):	£100 million

Thus the overall cost of the flood defence system for Richmond for the period to 2050 is about £270 million. The date 2050 was selected as it is before the major improvement to the flood defence system is likely to be carried out. The tidal flood defences in this area are covered by the 'Thames River (Prevention of Floods) Acts 1879 to 1962'. This places liability for maintenance and ultimate replacement of tidal flood defences on the Riparian Owner (freeholder of the land under or adjacent to the tidal defence). The council should be aware of these costs because contributions may be needed where the council is the Riparian owner, a Riparian Owner cannot be found, or the Riparian Owner is unable to finance works.

### **TE2100 land requirements**

It is important that requirements for safeguarding land are incorporated into strategic plans, in particular site allocation documents for Thames riverside development. The following information can be used as a starting point for further discussions to inform site allocations and policies.

The flood defences in Richmond consist of 'hard' defences (walls) and 'soft' defences (embankments).

The hard defences could be raised within the existing defence footprint (or with only a small increase in width). However the structures would be tall, unattractive and would restrict public access and views of the estuary. Additional space will be needed when the defences are raised both for the defence engineering works and also for other enhancements such as suitable public access. Raising of embankments would require more space than the existing defence footprint.

The river frontage in much of the Richmond area is environmentally sensitive and raising of defences will also require raising of footpaths, landscaping and other enhancements. Increases in the maximum water level allowed through the Thames Barrier of 0.5 or 1m would require treatment of most of the frontages to maintain public access and use of the river.

In addition to the requirements for defence raising, land is also required for maintaining, replacing and improving the flood defences. Corridors of land along the existing defence lines should be safeguarded. This should include space for vehicle access for maintenance and repair of the defences. We suggest that the width of land that should be safeguarded for future flood risk management interventions on the Thames could be of the order of 10 metres. More space may be required especially if wider requirements are to be achieved.

However land requirements will depend on the particular site, the defence type and proposed riverside improvements, and should be discussed and agreed with the Environment Agency. Figure 3 shows the flood defence line, where land should be safeguarded.

There is considerable scope in Richmond for local flood defence realignments to achieve landscape, public amenity and environmental enhancements. Where realignments of the existing defences are envisaged, land will be required including an allowance for future defence raising.

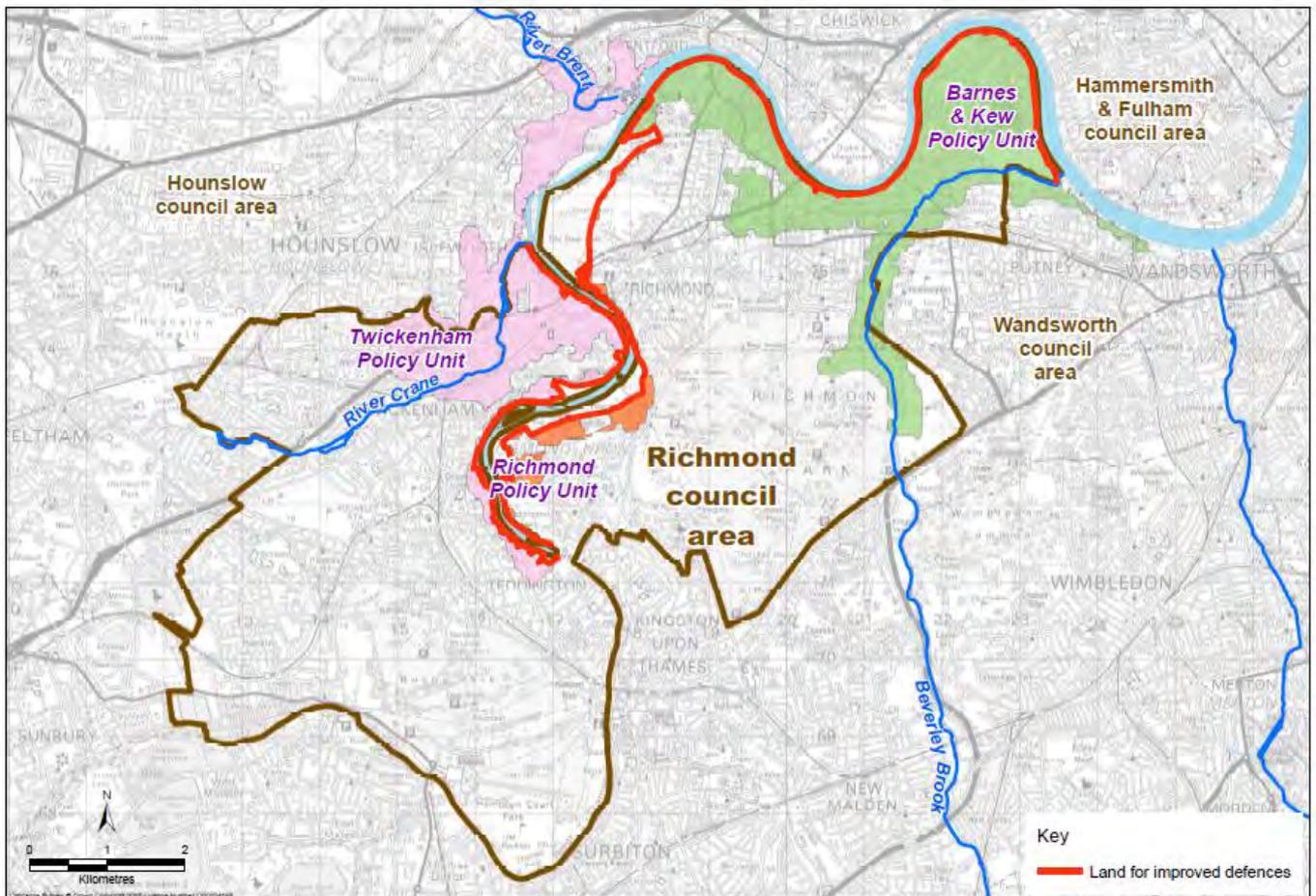


Figure 3: London Borough of Richmond: indicative land requirements for flood risk management

## Design of works including potential enhancement opportunities

### Essential requirements for flood risk management

The essential requirements for flood risk management include raising of the defences as outlined above together with the routine activities of inspection, maintenance, repair and replacement of defences as required. Raising the defences on the existing 'footprint' would achieve the flood risk management objectives of the TE2100 Plan but would not provide any wider landscape or environmental benefits and would introduce a barrier to viewing the river from the landward side.

### Potential enhancement opportunities

There is an opportunity to improve the riverside both when defences are raised and when they are repaired or replaced. The Environment Agency has developed guidance and can provide examples for improving the riverside. Significant public access and public amenity improvements, landscape improvements and environmental enhancements can be achieved at modest cost if they are included as part of an integrated riverside design that includes flood defences.

The example in Figure 4 shows a riverside improvement in a parkland area that includes timber cladding of a vertical wall, a floodable riverside footpath and a local set back of the flood defence line to create an intertidal area. Figure 5 shows an example of how the riverside path in the Barnes and Kew policy unit might be improved when the defences are raised by raising the riverside path and remodelling the sloping river bank.

The designs must accommodate the existing flood defence crest levels and enable the defences to be raised in the future. The design and levels for any floodable riverside path should be set to avoid frequent flooding and to take account of future increases in water levels.

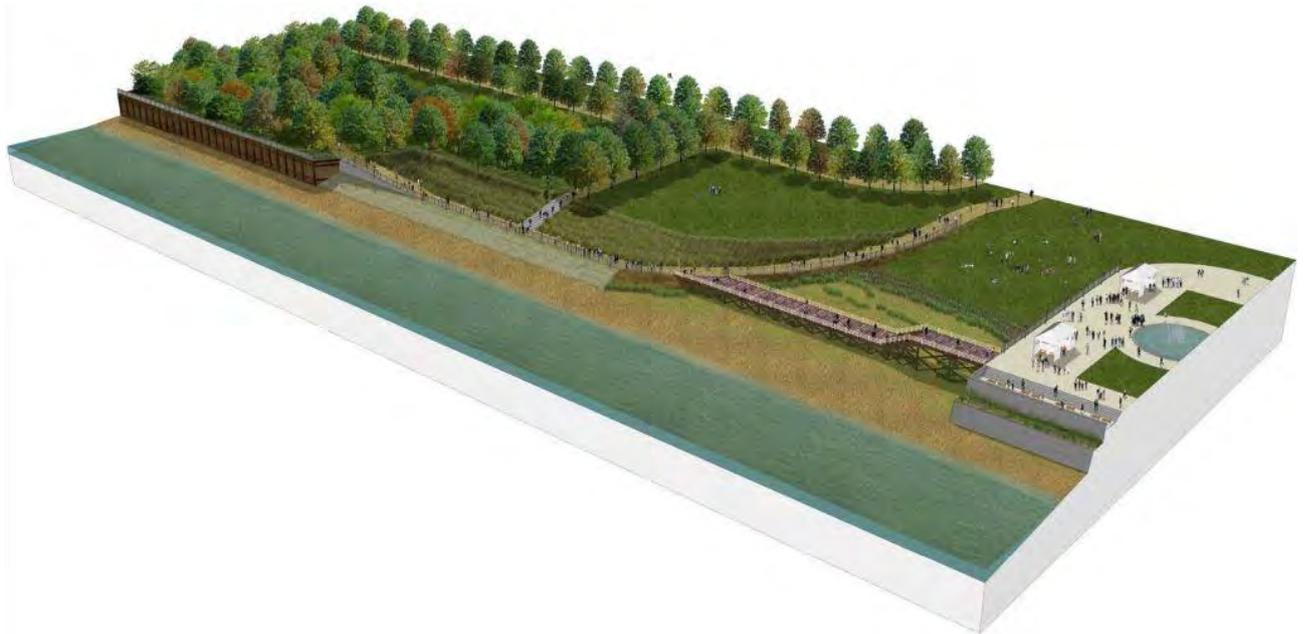


Figure 4: Riverside improvement in a parkland area (Source: Environment Agency)

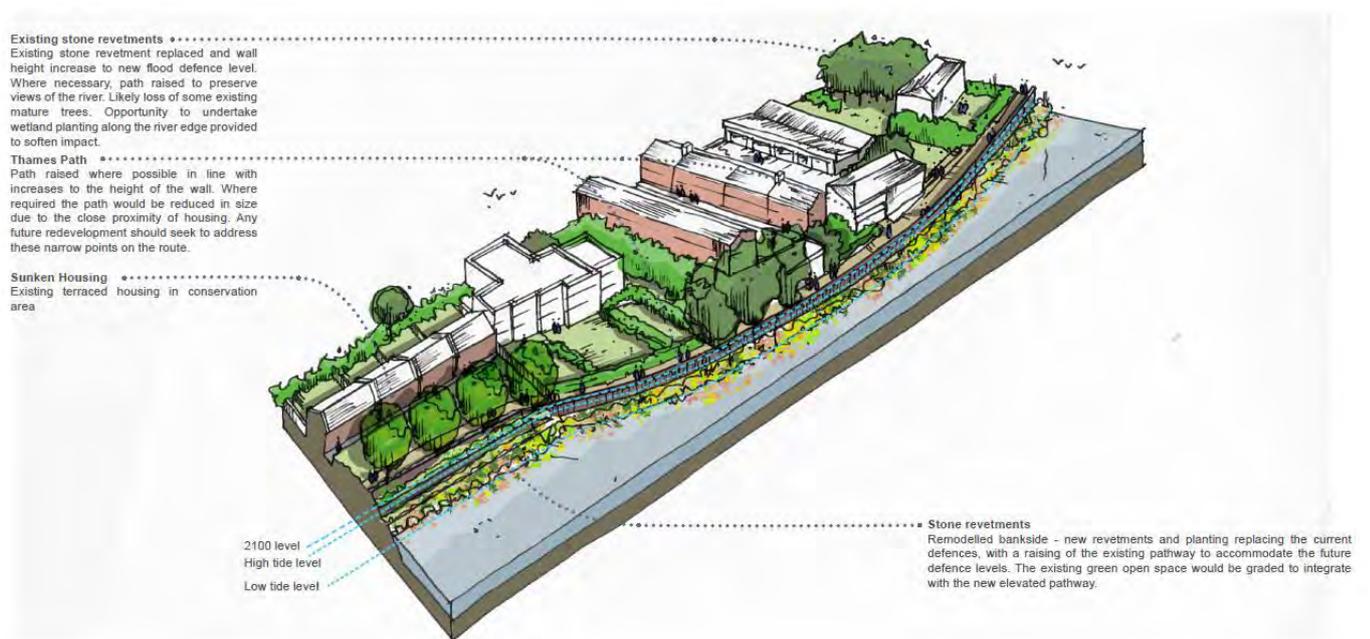


Figure 5: Defence raising involving raising of an existing public footpath (Source: Environment Agency)

## Key policy messages

The following are suggestions of policy messages that could be incorporated into the London Borough of Richmond strategic planning documents to ensure that the recommendations of TE2100 are implemented in new developments.

A specific commitment for the local council to work with the Environment Agency and others to ensure the recommendations of the TE2100 Plan are implemented in new and existing developments, to keep communities safe from flooding in a changing climate and improving the local environment.

A requirement for new developments to help reduce flood risk now and into the future and to act on the recommendations of the TE2100 Plan. This could include for example:

- Raising existing flood defences to the required TE2100 Plan levels in preparation for future climate change impacts or demonstrate how tidal flood defences protecting sites can be raised to the required TE2100 levels in the future through submission of plans and cross-sections of the proposed raising;
- Demonstrating the provision of improved access to existing flood defences and safeguarding land for future flood defence raising and landscape, amenity and habitat improvements;
- Maintaining, enhancing or replacing flood defences to provide adequate protection for the lifetime of development;
- Where opportunities exist, re-aligning or setting back flood defence walls and improving the river frontage to provide amenity space, habitat, access and environmental enhancements.
- Securing financial contributions towards the anticipated costs of flood risk management infrastructure required to protect the proposed development over its lifetime.

## Links to other plans and guidance

The following documents provide further information:

The **Thames Estuary 2100 (TE2100) Plan** can be found at:

[Thames Estuary 2100 \(TE2100\) - Publications - GOV.UK](#)

The **Strategic Flood Risk Assessment (SFRA)** for the London Borough of Richmond can be found at:

[http://www.richmond.gov.uk/home/environment/planning/planning\\_guidance\\_and\\_policies/local\\_development\\_framework/local\\_development\\_framework\\_research/flood\\_risk\\_assessment.htm](http://www.richmond.gov.uk/home/environment/planning/planning_guidance_and_policies/local_development_framework/local_development_framework_research/flood_risk_assessment.htm)

**Flood defence consenting information.** Consent is required from the Environment Agency before individuals carry out any works on, over, under or near tidal flood risk management assets. Therefore, flood defence consent should be obtained by a developer ahead of raising or realigning tidal flood defences. The consent form and accompanying guidance can be found at:

<https://www.gov.uk/flood-defence-consent-england-wales>

**Living on the edge** is an Environment Agency guide that explains roles and responsibilities for flood risk management and how riparian owners can work with flood risk management authorities and other organisations. It can be found at:

<https://www.gov.uk/government/publications/riverside-ownership-rights-and-responsibilities>

**Partnership funding for new and improved flood and coastal defence work** introductory guidance outlines how central government capital funding is currently allocated to flood risk management projects. This guidance is available at:

<https://www.gov.uk/government/policies/reducing-the-threats-of-flooding-and-coastal-change/supporting-pages/funding-flood-and-coastal-erosion-risk-management-in-england>

**Thames Strategy – Kew to Chelsea** is a landscape strategy that covers the Thames from Kew to Chelsea and provides landscape guidance for improving the riverside in Richmond downriver of Kew Bridge. It can be found at:

<http://www.thamesstrategy-kewtochelsea.co.uk/about/thames-strategy>

**Thames Strategy – Hampton to Kew** is a landscape strategy that covers the Thames from upstream of Teddington to Kew and provides landscape guidance for improving the riverside in Richmond upriver of Kew Bridge. It can be found at:

<http://thames-landscape-strategy.org.uk/who-we-are/vision/the-review-of-the-thames-landscape-strategy/>

## Contact details

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