



17 March 2025

Spatial Planning and Design,  
London Borough of Richmond upon Thames

Dear Sir/Madam,

### **Proposed Modifications to the Pre-publication Local Plan**

We are grateful to the Council for allowing us the opportunity to comment on the Proposed Modifications. We made comments on the Draft Plan in 2023 and also at the Public Examination in the summer of 2024. We feel that some of our comments have been addressed but would like to make two comments on the Proposed Modifications.

#### **(1) Building heights in the Site Allocations**

We are pleased to see that the thumbnail sketches of appropriate building heights on some of the Site Allocations have been enlarged so as to become more legible. The enlargements reveal subtle detail in the Arup Urban Design study which was not apparent in the thumbnail sketches. We are particularly pleased to see that the building heights for the Stag Brewery redevelopment (SA35), viz. 7 storeys along the waterfront (not 8 or 9 as in the scheme presented at the inquiry) and in place of the existing tall industrial buildings in the centre of the site, make a lot of sense and should have been followed in the proposed scheme that is now awaiting a verdict. Instead, the Council chose to ignore the Arup study describing it as 'broad-brush'. We fundamentally disagree.

#### **(2) Outbuildings in back gardens**

We feel the issue of outbuildings needs further attention. The Proposed Modifications hardly address this in Policy 15, albeit they make some reference to it in Policy 39. We cannot recall this issue being discussed at the Public Examination (admittedly I was overseas for some of the time) and, since the Examination, the issue has evidently become more significant. We have drawn attention to this in a letter to the Council dated 9 December 2024 and we are doing so again in relation to the new Local Plan.

In our letter to the Council, we drew attention to two problems:

- (a) planning applications for a certificate of lawful development for outbuildings were being assessed in terms of whether the buildings complied with the dimensions given in the GPDO but not in terms of their impact on a Conservation Area, protected landscape, site of nature conservation importance (which we note has been given more prominence in the Proposed Modifications) and/or flood-risk. Admittedly such issues can be addressed through imposition of an Article 4 direction if in a Conservation Area, but not otherwise.
- (b) Planning applications for outbuildings in the form of mobile homes, self-contained with living room, bedroom, kitchen and bathroom and with access to the services of the main house, are being allowed because mobile homes come under the control of the Caravan Sites Act, not the Planning Act. These would be acceptable – and could maybe help the Council to

achieve its housing supply targets – if the mobile homes were genuinely mobile. But they are not, they do not have wheels, they arrive on site as construction kits and they could become permanent fixtures. The Council cannot refuse such development in the knowledge that such development has been and will continue to be allowed on appeal. This needs to be rectified through a change in legislation.

We would like to see the issue of outbuildings addressed more fully in the Local Plan and/or in a Supplementary Planning Document.

Yours sincerely

Tim Catchpole, Chair of MESS