

Report of Consultation on the Proposed Main Modifications to the Local Plan

Richmond upon Thames Local Plan

31 March 2025

1. About the consultation

- 1.1 The Publication Local Plan was submitted to the Secretary of State on 19 January 2024. Following the Hearing Sessions as part of the Examination in Public held in June and July 2024, the Planning Inspectors, Jameson Bridgwater PGDipTP MRTPI and Graham Wyatt BA(Hons) MRTPI, proposed a list of [Main Modifications to the Plan](#). Main Modifications are those which the Inspectors consider are necessary to make the plan sound and/or legally compliant. These were subject to consultation from 31 January to 17 March 2025. The proposed Main Modifications (including changes to the Policies Map designations where relevant) were subject to [Sustainability Appraisal](#) and [Habitats Regulation Assessment](#), and comments could also be made on these Addendum Reports.
- 1.2 The [Statement of Consultation \(January 2024\)](#), last updated at submission, set out how the preparation of the Local Plan had complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 (as amended) and the Council's adopted Statement of Community Involvement. This standalone report sets out the details about the consultation on the Proposed Main Modifications to the Local Plan, including the representations received and a summary of the main issues raised, and is intended to provide clarity on the process.
- 1.3 The consultation was on the proposed Main Modifications (including changes to the Policies Map designations where relevant) and not other aspects of the Plan, that have already been considered by the Inspectors during the Examination process and/or hearing sessions. It was made clear that any representations received that do not relate to the Main Modifications will not be forwarded to the Inspectors.
- 1.4 The Main Modifications [consultation](#) details were on the Council's website. The consultation documents available were:
- [Schedule of Proposed Main Modifications \(including changes to the Policies Map designations where relevant\)](#) (January 2025)
 - [Sustainability Appraisal Addendum of the Proposed Main Modifications](#) (January 2025)
 - [Habitats Regulation Assessment Addendum of the Proposed Main Modifications](#) (January 2025)
- Hard copies of the consultation documents were also available to view at the Civic Centre in Twickenham and in the main libraries.
- 1.5 The Council directly notified stakeholders who had made representations on the Local Plan at the Publication (Regulation 19) consultation, indicating they had comments they wished to be considered as part of the Examination in Public. As the Main Modifications consultation was open to anyone to respond, the details were also signposted in the Council's [consultation portal](#), the Council's weekly News & Updates emails, and a public notice was placed in the Richmond & Twickenham Times on 6 February 2025.

2. Summary of representations received

- 2.1 The Council received comments from 90 respondents that were relevant to the Proposed Main Modifications.
- 2.2 Below is a summary of the main issues raised, as well as noting where there were no comments relating to certain Proposed Main Modifications. (Note, this report does not summarise the Proposed Main Modifications, which need to be read in the list of [Main Modifications to the Plan](#)).
- 2.3 A Schedule of all the comments that were relevant to the Proposed Main Modifications has been published, with comments moved/grouped so that common points are viewed together, in Plan order by each Proposed Main Modification. In addition, there are appendices of any details that could not be captured with full clarity in the main Schedule. The representations are also available online, with personal information redacted. The following documents set out in full these responses received:
- Schedule of All responses received to the Consultation on Proposed Main Modifications to the Local Plan (March 2025)
 - Appendices to Schedule of All responses received to the Consultation on Proposed Main Modifications to the Local Plan (March 2025)
 - Copies of each response in full (with redactions as appropriate) as a single pdf that can be viewed via the Examination Library containing all the responses relevant to the Proposed Main Modifications.
 - Schedule of All responses received to the Consultation on Proposed Main Modifications to the Local Plan and the Council's response (to be published)
- 2.4 The Council will be publishing a brief response to the main issues raised in each response, with a further column to the Schedule setting out the Council's response to the Inspectors.

Main issues raised

- 2.5 Respondents were received from individuals, organisations and statutory consultees, commenting across a number of the Proposed Main Modifications. Some were from those who had been involved in the Examination process to date, while some were from new respondents. The majority of comments received related to concerns about Eel Pie Island and flood risk (MM44 (Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy))), particularly from residents, businesses and visitors to the island.

General comments

- A number of general responses were made by statutory bodies and organisations which dealt with introducing their comments on specific Main Modifications. Surrey County Council (MM Rep No. 1) confirm they have no comments. Transport for London (MM Rep No. 2) reference their general support for the points addressed as set out in the Statement of Common Ground, while noting there are a small number of outstanding issues that are

not in line with the 2021 London Plan and update specific comments on particular modifications, stating they look forward to continuing joint working to deliver integrated planning and make the case for continued investment in transport capacity and connectivity to enable Good Growth. The Environment Agency (MM Rep No. 3) are satisfied that with the proposed modifications the Plan remains sound in line with the NPPF. WSP on behalf of Sainsbury's Supermarkets Ltd (MM Rep No. 4) are pleased to see modifications relating to some of their previous Regulation 18 and 19 representations, but there are still some matters to be reconciled. National Highways (MM Rep No. 5) set out details about and the context for their role, providing comments on local plans that have the potential to affect any part of the Strategic Road Network (SRN) and how they would specifically be concerned with any proposals which have the potential to impact the M3 Junction 1 and M4 Junctions 1 to 3. The GLA on behalf of the Mayor of London (MM Rep No. 6) sets out the remit for their comments including that all Development Plan Documents in London must be in general conformity with the London Plan, and endorsing the comments submitted by Transport for London. The GLA raise a general conformity issue, which is made against **MM49**. Some general comments are contained within the specific comments of respondents, such as Natural England's overall position that they have no further specific comments on the details of modifications is made within **MM3**.

- There were no comments on the Sustainability Appraisal (SA).
- There were no comments on **MM1** (Title page and introduction).

Habitats Regulation Assessment (HRA)

- Natural England comment on the Habitats Regulation Assessment (HRA) (MM Rep No. 7) noting that an appropriate assessment of the Plan has been undertaken, and that they have worked with the Council throughout the Plan process towards an agreeable position within the HRA, with the Addendum reflecting Natural England's ongoing advice and expectations within the assessment detail and through its conclusions. Natural England have reviewed the updated HRA and having considered the appropriate assessment, and the measures proposed to mitigate for all identified adverse effects, Natural England advises they concur with the assessment conclusions, and have no further comments to make on the Plan. Natural England acknowledge their previous comments on the HRA conclusions regarding the air quality assessment for Richmond Park SAC have been appropriately addressed, with a more detailed assessment and consideration of the wider road network in and around Richmond Park SAC and additional clarification of the presence of any habitats important for the qualifying species (Stag Beetle) that may be within proximity to the road network.
- Comments were received on the Habitats Regulation Assessment (HRA) from Caroline Shah (MM Rep No. 8) which relate to the updated HRA Report (June 2024) and that significant further changes need to be made to ensure it is correct, evidence-based, consistent and reaches conclusions that cannot be undermined by rational argument. The screening out of Richmond Park from needing Appropriate Assessment for recreational pressure is not based on evidence or justified and does not follow the precautionary principle, and the screening out of pollution from the new Richmond Local Plan as having no likely significant in terms of air quality either alone or in-combination with other plans

and projects is mistaken, commenting on pollution as having an effect on the habitats of the stag beetle in Richmond Park SAC.

Vision and Strategic Objectives, Spatial Strategy, Place-Based Strategies and Site Allocations

- The Environment Agency (MM Rep No. 9) support the update to reference natural flood management set out in **MM3** (Strategic Objectives), and Natural England point out the typo as it should reference natural flood management (MM Rep No. 10).
- *A comment from Valerie Scott obo Henry Harrison relates to **MM8** (Site Allocation 2 Platts Eyot) which is referenced in the summary of comments on Eel Pie Island under MM44 below (MM Rep No. 26).*
- WSP on behalf of Sainsbury's Supermarkets Ltd (MM Rep No.s 11 and 12) support **MM9** and **MM10** (Site Allocation 4 Car Park for Sainsburys, Hampton) in reference to parking and Biodiversity Net Gain (BNG) requirements.
- Sport England (MM Rep No. 13) object to **MM16**, **MM17** and **MM18** (Site Allocation 21 Kneller Hall, Whitton) raising concern that the whole site is designated as a SINC. The policy text does not appear to support the current proposal for the site (a single artificial pitch with sports lighting, surrounded by acid grassland) and the wording should reflect what will be delivered to provide certainty to the applicant. Weight should be given to the Playing Pitch Strategy and the sporting need demonstrated that was expected to be met on the site. Sport England did not previously pick up the playing fields designated as new SINC's, and would have raised questions about whether the criteria could be met (*links to their comments on MM89*).
- WSP on behalf of Sainsbury's Supermarkets Ltd (MM Rep No. 14) comment on **MM26** (Site Allocation 30 Sainsburys, Lower Richmond Road, Richmond) and do not object to the reference to PTAL but do consider there should be reference to requiring adequate servicing. This is to ensure that any future commercial uses on site can operate efficiently without impediment, and Sainsbury's consider overall the current wording of the allocation makes the Plan unsound. Transport for London (MM Rep No. 15) comment on MM26 that the site should be treated as PTAL 5.
- Avison Young on behalf of St George Plc (MM Rep No. 16) support **MM27** and **MM28** (Site Allocation 31 Kew Retail Park, Kew). Transport for London (MM Rep No. 17) comment on MM27 to maintain their Regulation 19 comment that the subjective PTAL score wording 'worst to poor' should be removed.
- Sport England (MM Rep No. 18) comment on **MM29** (Site Allocation 34 Richmond Athletic Association Ground, Old Deer Park) that the alterations to the text are not all correct and need to reflect the evidence in the Council's Playing Pitch and Outdoor Sports Strategy (2023) in relation to the existing situation and recommendations for improvements.
- There were no comments on the following Main Modifications:
 - **MM2** (Strategic Vision)
 - **MM4** (Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy))
 - **MM5**, **MM6** or **MM7** (Policy 2 Spatial Strategy: Managing change in the borough (Strategic Policy))
 - **MM11** (SA 6 Telephone Exchange, Teddington)

- **MM12** (SA 7 Teddington Delivery Office, Teddington)
- **MM13** (SA 10 St Mary's University, Strawberry Hill)
- **MM14** (SA 13 Twickenham Stadium, Twickenham)
- **MM15** (Place-based Strategy for Whitton & Heathfield)
- **MM19, MM20, MM21, MM22** (SA 22 Whitton Community Centre, Whitton)
- **MM23** (Place-based Strategy for Richmond & Richmond Hill)
- **MM24** (SA 25 Richmond Station, Richmond)
- **MM25** (SA 26 Former House of Fraser, Richmond)
- **MM30** (SA 35 Stag Brewery, Mortlake)
- **MM31** (SA 37 Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen).

Theme: Responding to the climate emergency and taking action

- The Environment Agency (MM Rep No.s 19 to 24) support the clarity added by **MM32** (Policy 3 Tackling the Climate Emergency (Strategic Policy)), **MM34** (Policy 6 Sustainable Construction Standards), **MM35, MM37, MM39, MM40** and **MM42** (Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy)), commenting where these reflect agreement in the Statement of Common Ground.
- There were 77 comments from residents, businesses and visitors to Eel Pie Island on **MM44** (Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy)) (Valerie Scott on behalf of Henry Harrison MM Rep No. 26, Andrea Plos MM Rep No. 27, Laura Arrigoni MM Rep No. 28, Max Balfour MM Rep No. 29, Sam Dibley MM Rep No. 30, Simon and Sheba Cassini MM Rep No. 31, Roger Cutler MM Rep No. 32, Holly Tucker MBE MM Rep No. 33, Ian Kroch MM Rep No. 34, Alexander Lewis MM Rep No.35, Natalie Peter MM Rep No. 36, Aidan Boulter MM Rep No. 37, Mark Gunning MM Rep No. 38, Peter Hunter MM Rep No. 39, Paul and Claire Gowers MM Rep No. 40, Sebastian Head MM Rep No. 41, Ben Holland MM Rep No. 42, Clive Chapman on behalf of Jack Betteridge MM Rep No. 43, Clive Chapman MM Rep No. 44, Sean Barrett MM Rep No. 45, Emma Burke MM Rep No. 46, Maher Maksoud MM Rep No. 47, Shauneen Austin MM Rep No. 48, Josh McGee MM Rep No. 49, Dannie Walton MM Rep No. 50, Nicola Cooper (supported by Helen Montgomery-Smith) MM Rep No. 51, Jack Garrett-Jones MM Rep No. 52, Lacy Chapman on behalf of Ian Tyson MM Rep No. 53, Lacy Chapman on behalf of Barry and Val Armstrong MM Rep No. 54, Celia Holman MM Rep No. 55, Colin Heath MM Rep No. 56, Coryn and Stephen Andrews MM Rep No. 57, Robert Tucker MM Rep No. 58, Sally Tucker MM Rep No. 59, Francesca Unsworth MM Rep No. 60, Tony and Jane Schiemann MM Rep No. 61, Heather Ganf MM Rep No. 62, David Hopwood MM Rep No. 63, Catherine Bruzzzone MM Rep No. 64, Richard Wayman MM Rep No. 65, K. Swift MM Rep No. 66, Martin Wallraff and Claudia Villasis-Wallraff MM Rep No. 67, Melanie Riach MM Rep No. 68, Daniel Marques Sampaio MM Rep No. 69, Lucinda Pickard MM Rep No. 70, Dr Diana Calam MM Rep No. 71, Stephen Harrison MM Rep No. 72, Mareike Mundorff MM Rep No. 73, Carmel Morrissey MM Rep No. 74, Emma Edwards MM Rep No. 75, Jane Probyn MM Rep No. 76, Isabel Offler MM Rep No. 77, Marcia and Frederick Ayres MM Rep No. 78, Winifred Swift MM Rep No. 79, Hugh and Claire Brasher MM Rep No. 80, Philippa Boulter MM Rep No. 81, Nicola Lyon on behalf of Twickenham Rowing Club MM Rep No. 82, Anne Perry

MM Rep No. 83, Tommy Cooper on behalf of Michael Cooper MM Rep No. 84, Eileen Munro MM Rep No. 85, Steven Nalon MM Rep No. 86, Chloe Hall MM Rep No. 87, KA Oberc MM Rep No. 88, Nick Dinnage MM Rep No. 89, Doug Garrett MM Rep No. 90, Alexandra and Elizabeth Strick MM Rep No. 91, Anne Edwards MM Rep No. 92, Gabrielle Spriggs MM Rep No. 93, Elisabeth Bell MM Rep No. 94, Graeme Rimmer MM Rep No. 95, H W Cope- Harrison MM Rep No. 96, Jake and Lauri Riviera MM Rep No. 97, Penny Jones MM Rep No. 98, Neil Fraser MM Rep No. 99, Neil Fraser on behalf of Fraser & Fraser MM Rep No. 100, Beverley Johnston MM Rep No. 101, and Nicki Bell MM Rep No. 102). They are all concerned that MM44 and the change to the definition of the functional floodplain in the supporting text to Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy) will have a detrimental impact on Eel Pie Island, through redesignating it as part of the functional floodplain when its access and 95% of the island are not in the functional floodplain as currently defined. As the borough's largest and most economically active island, there are concerns it needs to be able to adapt to change and remain viable and vital, for residents and preserving its distinctive cultural and important commercial uses, including for artists, river-related industries, and sports clubs.

- The comments raise significant concerns about:
 - Implications for the provision of new residential properties, extensions, and change of use conversions. There are concerns planning permission and PD rights would be adversely affected, and it would make even modest property improvements difficult. Concerns are raised that recent planning applications are being refused due to this change in policy and the Council is taking a more restrictive approach than in the past.
 - Implications on residential mortgages and business loans, and insurance premiums. There are concerns that these will be harder to obtain and/or more expensive, for residents and businesses. Comments set out this will undermine property values, and making property difficult to sell.
 - The Local Plan process has lacked proper consultation and public scrutiny. The Publication Local Plan did not include the proposed change to the definition of the functional floodplain, and so representations could not be made to be heard on this issue at the Examination in Public hearings. The introduction of the issue in the updated Statement of Common Ground between the Council and the Environment Agency (June 2024) missed the opportunity for involvement.
- Many of the comments set out that there is no detailed explanation or justification for the redefinition of the functional floodplain, by the Environment Agency or the Council. The updated Statement of Common Ground between the Council and the Environment Agency (June 2024) is incorrect, including to state that the borough's islands are treated as one undifferentiated whole by stating the islands are in Flood Zone 3b. The Aurora Mapping shows the access for Eel Pie Island, and other islands, are located in Flood Zone 3a. Only 5% of Eel Pie Island is designated as functional floodplain. There is egress to Flood Zone 1 via the public steps up to Diamond Jubilee Gardens.
- Some comments reference previous Strategic Flood Risk Assessments (SFRAs) in 2010 and 2016, as referencing Eel Pie Island was reclassified to Flood Zone 3a, and how an exception was made. There are comments that other London Boroughs identify the functional floodplain as Flood Zone 3b. Comments set out details about how those on the island live and work taking

into account spring tides (at most a few hours when the river is at flood levels), and that the island has never flooded in the past. Some comments reference it is raised above the river channel. Some comments refer to resilience measures that are already in place. It is stated this is significant when assessing the risk to life in an extreme flood event.

- Some of the comments address that each island presents a unique set of circumstances, including how they are accessed and the Flood Zones that apply, and a 'one-size' fits-all' approach fails to take this into account. 50% of the borough's islands have their access in Flood Zone 3a. Some are in the non-tidal Thames. Some comments suggest the approach is inconsistent with Platt's Eyot, with nearly identical flood risk characteristics, where **MM8** (Site Allocation 2 Platts Eyot) introduces dwelling to the existing land uses and redevelopment is being actively supported in the Local Plan with reference to further residential development; some comments also note it is located in the non-tidal Thames.
- The comments seek that the existing definition of the functional floodplain as Flood Zone 3b should be retained, or as has happened in previous SFRAs and Local Plans an exception should be made for Eel Pie Island, and allowing for site-specific assessments. Some comments suggest the appropriate response instead should be to separate the access concerns and address the infrastructure issues relating to the bridge and embankment.
- The Environment Agency's response on MM44 confirms the Council's definition of defining land riverward of tidal defences is consistent with the PPG (MM Rep No. 25).
- Thames Water comment (MM Rep No. 103) on **MM46** (Policy 9 Water Resources and Infrastructure (Strategic Policy)) supporting the amended wording in part D in relation to early engagement and at paragraph 16.99 with regard to phasing, but object to the deletion of part F which relates to requiring applicants of major development to provide evidence that capacity exists in the public sewerage and water supply network. Thames Water set out the requirements for the Local Plan process to ensure there is capacity for water and wastewater infrastructure to serve all new developments, including through planning for any necessary infrastructure reinforcement (not underestimating timescales for delivery) and their free pre-planning service. Thames Water set out that Part F should be reinstated to require the applicants of major developments to provide evidence that capacity exists in the public sewerage and water supply network – this evidence can come from the early engagement with Thames Water.
- Thames Water (MM Rep No. 104) and the Environment Agency (MM Rep No. 19) support **MM47** (Policy 9 Water Resources and Infrastructure (Strategic Policy)).
- There were no comments on the following Main Modifications:
 - **MM33** (Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy))
 - **MM36, MM38, MM41, MM43** (Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy))
 - **MM45** (Policy 9 Water Resources and Infrastructure (Strategic Policy)).

Theme: Delivering new homes and an affordable borough for all

- The GLA on behalf of Mayor of London comment (MM Rep No. 105) on **MM48** (Policy 10 New Housing (Strategic Policy)) stating that it is incorrect, as the London Plan housing target for 2019-2029 should be reflected. The GLA state it should be clear if there is a shortfall, if the borough can meet the target for the whole period, and that the target should not reduce beyond 2029, referring to the work commencing on the next London Plan. Avison Young on behalf of St George (MM Rep No. 106) support MM48. National Highways (MM Rep No. 107) noting the stepped trajectory, comment the housing requirement for the plan period is unlikely to significantly alter the impact of the plan on the Strategic Road Network (SRN).
- The GLA on behalf of Mayor of London's intention is to maintain his general conformity objection (MM Rep No. 109) on **MM49** (Policy 11 Affordable Housing (Strategic Policy)) as it does not follow the threshold approach in Policy H5 of the London Plan. The GLA comment the modifications do not reflect discussions following the hearings, there is no explanation how the approach would work in practice and creates ambiguity, which would lead to more applications following the Viability Tested Route resulting in less and slower affordable housing delivery. The GLA highlight text that should be removed – including stating applicants can either follow the Fast Track Route or the Viability Tested Route, that reference to all employment sites should only apply to industrial land, and the LHNA reference should be retained as 552 affordable home ownership products rather than the chosen mid-point figure. Avison Young on behalf of St George (MM Rep No. 108) support MM49.
- There were no comments on **MM50** (Policy 13 Housing Mix and Standards)

Theme: Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic

- There were no comments on the following Main Modifications:
 - **MM51** (Policy 17 Supporting our Centres and Promoting Culture (Strategic Policy))
 - **MM52** (Policy 18 Development in Centres)
 - **MM53, MM54** (Policy 19 Managing the Impacts of Development on Surroundings)
 - **MM55** (Policy 20 Shops and Services Serving Essential Needs).

Theme: Increasing jobs and helping business to grow and bounceback following the pandemic

- There were no comments on the following Main Modifications:
 - **MM56** (Policy 22 Promoting Jobs and our Local Economy)
 - **MM57** (Policy 24 Industrial Land)
 - **MM58** (Policy 27 Telecommunications and Digital Infrastructure (Strategic Policy)).

Theme: Protecting what is special and improving our areas (heritage and culture)

- Historic England MM Rep No. 110) note **MM59** (Policy 28 Local Character and Design Quality (Strategic Policy)) does not raise a soundness issue, but regret the end of the Conservation Area Appraisals and encourage the Council to continue with updating.

- The London Historic Parks and Gardens Trust (MM Rep No. 111) support in **MM61** (Policy 30 Non-designated Heritage Assets) the reference to the London Historic Parks and Gardens Trust Inventory.
- Historic England (MM Rep No. 112) support the reference in **MM63** (Policy 33 Archaeology) to early engagement with GLAAS.
- There were no comments on the following Main Modifications:
 - **MM60** (Policy 29 Designated Heritage Assets)
 - **MM62** (Policy 31 Views and Vistas).

Theme: Increasing biodiversity and the quality of our green and blue spaces, and greening the borough

- WSP on behalf of Sainsbury's Supermarkets Ltd (MM Rep No. 12) are pleased to see **MM66** (Policy 39 Biodiversity and Geodiversity) and the alignment with the national minimum Biodiversity Net Gain (BNG) requirement to 10%.
- The Environment Agency (MM Rep No. 113) support the clarification in **MM69, MM70, and MM71** (Policy 40 Rivers and River Corridors), for improving outcomes for water quality and biodiversity in the riparian zone.
- There were no comments on the following Main Modifications:
 - **MM64** (Policy 35 Green Belt, Metropolitan Open Land and Local Green Space)
 - **MM65** (Policy 37 Public Open Space, Play, Sport and Recreation)
 - **MM67, MM68** (Policy 39 Biodiversity and Geodiversity).

Theme: Improving design, delivering beautiful buildings and high-quality places

- Avison Young on behalf of St George (MM Rep No.114) note **MM72, MM73, MM74, and MM75**, but consider the modified policy and the tall building maps at Appendix 3 remains unjustifiably restrictive. **Historic England** (MM Rep No. 115) broadly welcome these modifications to the policy and maps, stating these address points that they raised during the Regulation 19 consultation by reducing ambiguity, and are also helpful to some extent in relation to the site allocations they commented on.
- *These comments also relate to **MM87 and MM88**. See also the comments summarised below against Appendix 3: Tall and Mid-Rise Building Zones which include comments from Jan Black and Mortlake & East Sheen Society.*

Theme: Reducing the need to travel and improving the choices for more sustainable travel

- National Highways comments (MM Rep No. 116) note the additional clarity set out in **MM76, MM77, MM78, and MM79**. National Highways set out that if proposals share a boundary with the Strategic Road Network (SRN) or are likely to generate a significant/severe demand on the SRN, National Highways will also need to be consulted. However the comments recognise for Local Plan allocations, traffic impacts and any sustainable transport mitigation or capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process and details would be set out in the Infrastructure Delivery Plan (IDP).

- There were no comments on **MM80, MM81** (Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management).

Theme: Securing new social and community infrastructure to support a growing population

- There were no comments on **MM82** (Policy 49 Social and Community Infrastructure (Strategic Policy)).

Theme: Creating safe, healthy and inclusive communities

- There were no comments on **MM83** (Policy 51 Health and Wellbeing (Strategic Policy)) or **MM84** (Policy 54 Basements and Subterranean Developments).

Theme: Implementation, Delivery and Monitoring

- There were no comments on **MM85** (Policy 55 Delivery and Monitoring).

Glossary

- There were no comments on **MM86** (in relation to glossary definition of Public Transport Accessibility Levels (PTAL)).

Appendices

- Comments were received on **MM87** and **MM88** in relation to the updated Appendix 3 Tall and Mid-Rise Building Zones (Annex 1) raising particular concerns about the Stag Brewery. Jan Black (MM Rep No. 117) objects to the amount of high-rise development (red zone). The Mortlake & East Sheen Society (MM Rep No. 118) consider the enlarged thumbnail sketches have become more legible and reveal subtle details, and are pleased the building heights (7 storeys along the waterfront and in place of the existing tall buildings in the centre of the site) make sense and should have been followed in the proposed scheme awaiting a verdict; instead the Council chose to ignore the 'broad-brush' Urban Design Study and the Society fundamentally disagrees. *There are also related comments against **MM72, MM73, MM74, and MM75** summarised above which include comments from Avison Young on behalf of St George and Historic England.*
- Comments were received on **MM89** in relation to the updated Appendix 4 Review of Sites of Importance for Nature Conservation (SINCs) (Annex 2.1). Sport England (MM Rep No. 119) raise concerns regarding the inclusion of outdoor sport facilities such as tennis courts and playing fields within SINCs and whether there is sufficient justification for doing so, including whether the criteria in Government guidance was followed. Specific reference is made with regard to SINC designations at Pensford Field and East Sheen Common where modifications have been proposed to the SINC boundary as shown at Annex 2.2.

Representations raised on matters that were not related to Main Modifications

- 2.6 A number of representations did not refer to a Main Modification reference and officers could not suggest they related to a specific part of the Plan relevant to a Main Modification. This consultation was on the Proposed Main Modifications only and not on matters relating to other aspects of the plan, which have already been considered by the Inspectors during the examination process and hearing

sessions. Generally these other comments were considered to be raising new issues (Max Balfour, Julia Stafford, and Diana Hutchings), or repeating issues that they had raised earlier in the preparation of the Plan but were not subject to a Proposed Main Modification (Avison Young on behalf of St George Plc, The Offer Group Ltd, and some of the comments from WSP on behalf of Sainsbury's Supermarkets, Transport for London, Mortlake with East Sheen Society, and Historic England).

2.7 All these details have been shared with the Inspectors for information only. The following documents set out in full these responses received:

- Schedule of Other comments received not relating to Proposed Main Modifications to the Local Plan (March 2025)
- Appendices to Other comments received not relating to Proposed Main Modifications to the Local Plan (March 2025)
- Schedule of Other comments received not relating to Proposed Main Modifications to the Local Plan and the Council's response (to be published)

2.8 The Council will be publishing a brief response to these other issues raised in each response, with a further column to the Schedule setting out the Council's response, which will also be shared with the Inspectors for information only.

3. Next steps

3.1 The Main Modifications (including changes to the Policies Map designations where relevant) were proposed without prejudice to the Inspectors' final conclusion on the Local Plan which will take account of all representations submitted in response to this consultation. The general expectation is that issues raised on the consultation of the Main Modifications will be considered through the written representations process. It is expected that the Inspectors' Report will be available later this year. If the Inspectors find the Plan sound, it is anticipated that the Council will take the Plan forward for adoption later in 2025.