

All responses received on the Publication consultation Local Plan - plus Officer responses (published 30 06 2017)

Comment ID	Representor ID	Respondent name	Part of Local Plan responding to	Soundness - Legally Compliant	Soundness - Sound	Soundness - Complies with the Duty to Co-operate	Reason Consider Unsound - Positively Prepared	Reason Consider Unsound - Justified	Reason Consider Unsound - Effective	Reason Consider Unsound - Consistent with national	Details of reason(s) for representation	Change(s) consider necessary	Officer response
165	160	Shahina Inayath usein, London Underground	Publication Local Plan								<p>We have no comments to make at this stage except that London Underground Infrastructure Protection needs to be consulted as Statutory Consultees on any planning application within London Underground zone of interest as per TOWN AND COUNTRY PLANNING, ENGLAND-The Town and Country Planning (Development Management Procedure) (England) Order 2015 issued on 16th April 2015.</p> <p>Also, where there are intended works in the Highway we would need to be notified of these so that we can ensure there is no damage to them.</p>		Comments noted. No changes required.
183	288	Sarah Hoad, Transport for London	Publication Local Plan - General								<p>This letter follows receipt of the notification that the London Borough of Richmond has undertaken consultation on the publication version of the proposed Local Plan. The following provides relevant updates and commentary on the proposed wording where appropriate, which follows previous consultation in January 2016 and July 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> <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>Crossrail 2 The proposed Local Plan covers the period up to 2025. The Council will be aware that the GLA are in the early stages of preparing a new London Plan. Once adopted (expected in 2019), it will be necessary to consider whether or not there is a need to undertake an early review of the Local Plan to take account of any changes or updated policies.</p>	In particular TfL would support ambitions to deliver higher density development and additional housing in highly accessible areas around stations, or zones around stations.	Comments noted. No changes required.

															This could include the need to consider in more detail the potential for longer term development opportunities associated with planned major transport investment such as Crossrail 2.		
400	266	Dale Greetham, Sport England	Publication Local Plan		No										Please see Sport England's comments are previously submitted. These remain relevant and valid. <i>Please see Appendix 21 in this document for a PDF version of the comments referenced above.</i>		Comments noted. No changes required.
332	276	Katharine Harrison, Surrey County Council	Publication Local Plan												Thank you for consulting Surrey County Council on the London Borough of Richmond upon Thames Local Plan. We do not have any comments to make at this stage.		Comments noted. No changes required.
307	245	Hannah Harris, Royal Borough of Kingston upon Thames	Richmond Local Plan Publication - Duty to Cooperate	Yes	Yes	Yes									Thank you for consulting the Royal Borough of Kingston upon Thames on your Local Plan Publication (Regulation 19) document and for setting out the issues of strategic importance between our two boroughs. We have reviewed these issues, and after our subsequent meeting with you, which took place on 8 February 2017, to continue our Duty to Cooperate discussions, we can confirm that we have no formal objections to make.	We previously queried Richmond's approach to housing delivery in our response to your Pre-publication Plan consultation. Whilst we recognise that Richmond is able to meet, and recently exceeded, its London Plan housing target, it is noted that this falls well below your objectively assessed housing need. Therefore, please be aware that we are currently in no position to assist our neighbouring boroughs with their housing shortfall. We look forward to continuing discussions through the Duty to Cooperate.	Comments noted. No changes required.
418	196	Piotr Behnke, Natural England	Publication Local Plan and associated Habitats Regulations and Sustainability Appraisals												Having looked at the previous consultation response which Natural England submitted and taking into account the update you kindly supplied back in January regarding the changes made following our comments it would appear that we wouldn't have any issues to highlight regarding the four tests of soundness. The changes which were highlighted in that email dated 3rd January 2017 addressed a good number of the main points made in our previous correspondence dated 19th August 2016 which is a big positive and certainly does link up well with the Duty to Co-operate in terms of having listened to and actioned feedback from consultees. As such we would have nothing further to comment upon at this point in time and wouldn't be attending or thus wanting to speak at the examination in due course.		Support welcomed. No changes required.
248	265	Hannah Cook, Spelthorne Borough Council	Policy: 1.3.1 Other: Duty to Cooperate Statement / Published January 2017 / pg. 11												With regards to the Duty to Cooperate Statement (pg. 11) published in January 2017, having reviewed the minutes from our DtC meeting on 19th January 2016, Spelthorne BC requests that the wording be changed to more accurately reflect the discussion with regards to Kempton Park, "Consultant representing the developer behind Kempton Park is preparing background research and expecting to submit as a proposed site through the Local Plan route".		Comments in relation to the Duty to Cooperate Statement are noted. This Statement was submitted alongside the Local Plan in May 2017 for independent examination in public to the Planning Inspectorate. It is not considered necessary to update the Statement at this point in time; however, the comments in relation to Kempton Park are noted.

19	185	William Mortimer	Paragraph 1.3.5	Yes	Yes	Yes				<p>The Plan is certainly ready to go forward but I suggest a need to reflect changes from time to time as experience dictates. I note in the changes to the document since the draft version a greater reliance on the participation of voluntary organisations to deliver certain outcomes. This is a political intent outside the bounds of regulations for proposed developments in the Borough and the safeguarding of particular sites for community purposes. I am therefore disappointed that the absence of reservations for Emergency Management, which is part of the Council's responsibility. To that end, I will certainly follow up on the suggestion that I discuss this subject with persons responsible for the Emergency Plans already published on the LBRuT website, which I have briefly perused. Believing these to be less than adequate to the purpose associated spatial needs should be added to the 15-year plan in an evolutionary manner should the case be justified.</p>	<p>It is a shame that the reviewer is unable to suggest changes to what is a sound plan over the course of its history and hence my comment is to be found in the introductory element of this submission. All plans set an objective but if they are not constantly reviewed the outcomes will not meet the needs of the community.</p>	<p>Comments are noted; however, they relate to emergency management issues which are not land use planning and therefore do not fall within the remit of the Local Plan Review. Policy LP 28 (Social and Community Infrastructure) covers social and community infrastructure for the local community including policing, fire and ambulance services. Infrastructure requirements have been identified in partnership with the emergency services within the Infrastructure Delivery Plan.</p>
322	227	Jabed Rahman , Public Health, London Borough of Richmond	Paragraph: 2.2 Strategic Vision Section: Residential quality of life & Facilities to meet needs Page: 12, 14	Yes	Yes	Yes				<p>We welcome the opportunity to comment on the Local Plan as part of the second stage of consultation principally around procedural compliance and soundness of the plan and the Duty to Co-operate. We acknowledge that there has been previous input from other health colleagues including NHS Richmond Clinical Commissioning Group and acknowledge the efforts made by planning colleagues to ensure health input as part of the Duty to Co-operate process.</p> <p>Overall we are satisfied with the approach in recognising the significant impact the built environment has on people's wellbeing and the potential opportunities presented by the Local Plan to better influence positive outcomes in terms of the planning process. We also appreciate the Local Plan has been through a rapid Health Impact Assessment (HIA) to highlight areas of significant impact. As a consequence we do not have any issues around procedural compliance, soundness of the plan or any major amendments to make. There however are some additional wording which we feel would benefit overall consistency – these are attached in the email and underlined with relevant section headings and page numbers. We acknowledge that at this stage such suggestions may or may not be incorporated.</p> <p>Once the Local Plan has been formally adopted we would be keen to work with planning colleagues to monitor progress and outcomes.</p>	<p>Page 12, Residential quality of life</p> <p>"Richmond borough will be the best place in London to live as a result of the quality of the built environment <u>which considers the health and wellbeing of local residents</u> and the high quality design of new development that respects and enhances its distinctive character. The amenity of residents and local neighbourhoods will have been protected and action taken on environmental issues and pollution." Page 14 Facilities to meet needs "Residents will have a choice of new homes, including affordable homes, as well as the infrastructure required to support their daily needs. They will have access to a range of exceptional educational and training facilities, including a choice of schools and nurseries, community <u>and healthcare</u> facilities, shops and services as well as employment and recreational activities. Residents will have benefited from local training and employment opportunities, and they will continue to enjoy the strong sense of community and inclusiveness as well as social interaction and cohesion."</p>	<p>It is agreed that these minor amendments can be accommodated within the Strategic Vision to enhance the importance of health and wellbeing within the borough.</p> <p>Change first sentence of "Residential Quality of Life" paragraph (Local Plan Strategic Vision) Page 12, to read as follows: "Richmond borough will be the best place in London to live as a result of the quality of the built environment <u>which considers the health and wellbeing of local residents</u> and the high quality design of new development that respects and enhances its distinctive character."</p> <p>Change second sentence of "Facilities to Meet Needs" paragraph (Local Plan Strategic Vision) Page 14, to read as follows: "They will have access to a range of exceptional educational and training facilities, including a choice of schools and nurseries, community <u>and healthcare</u> facilities, shops and services as well as employment and recreational activities."</p>

409	73	James Cogan, GL Hearn on behalf of Evergreen Investment Retail Company	Paragraph: 2.2 Strategic Vision							<p>1. PREAMBLE</p> <p>1.1 These representations have been prepared by GL Hearn on behalf of Evergreen Retail Investment Company (hereinafter 'ERIC') in response to the consultation on the Richmond upon Thames Local Plan (Publication Version) (hereinafter 'the Richmond Local Plan').</p> <p>1.2 ERIC maintain land interests in the London Borough of Richmond upon Thames which are directly impacted by the proposed policies of the Richmond Local Plan.</p> <p>1.3 The London Borough of Richmond upon Thames' (hereinafter the 'Council') consultation on the Richmond Local Plan forms part of the preparation of the Council's Development Plan. Once adopted the Richmond Local Plan will form the basis of the Council's Development Plan, and will replace those existing policies of the Core Strategy, Development Management Plan, and Saved Unitary Development Plan.</p> <p>1.4 The purpose of the Local Plan is to update the Council's Development Plan in accordance with the National Planning Policy Framework (hereinafter 'NPPF'), National Planning Practice Guidance (hereinafter 'PPG') and Minor Alterations to the London Plan (hereinafter 'London Plan (2016)').</p> <p>1.5 Therefore in accordance with the overarching objectives of the NPPF, PPG and London Plan (2016), those policies of the Richmond Local Plan must plan proactively to meet the development needs of the borough in full.</p> <p>1.6 This consultation on the Richmond Local Plan represents the final opportunity to make representations ahead of the submission of the Richmond Local Plan to the Secretary of State for Examination in Public.</p> <p>1.7 In accordance with the NPPF and PPG, these representations of the Richmond Local Plan have been prepared on the basis of those tests of 'soundness' as outlined at paragraph 182 of the NPPF as follow. Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; Effective - the plan should be deliverable over its period</p>		<p>Comments noted. No changes required. The support for the strategic vision and strategic objectives is welcomed. It is noted that the respondent considers that the Plan is not consistent with the NPPF, London Plan and the Housing White Paper. However, the Council considers that the Plan meets the tests of soundness and that it is consistent with national policy and guidance. This is therefore likely to be a matter for discussion during the examination process.</p>
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and based on effective joint working on cross-boundary strategic priorities; and

Consistent - *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*

1.8 The representations and recommendations provided within this report have therefore been assessed against these tests of 'soundness', with conclusions drawn.

2. INTRODUCTION

2.1 These representations to the Richmond Local Plan have been prepared on behalf of Evergreen Retail Investment Company (hereinafter 'Our Client') in support of its property interests within the borough. These representations and recommendations consider the potential implications of the emerging policies of the Richmond Local Plan on our client's property interests.

2.2 Our client has recently purchased 3-33 King Street, Twickenham (hereinafter 'The Property'), which is currently a parade of shops at ground floor with residential and office uses above as well as a hall, known as Queen's Hall, to the rear. Access is currently achieved via King Street and a service road leading from Wharf Lane to the rear of the Property.

Figure 1: 3-33 King Street, Twickenham

See Appendix (5) in this document for Figure 1

2.3 The Property falls within Twickenham Town Centre, as defined by the Richmond Local Plan. It lies within the Twickenham Area Action Plan, and forms part of the wider site allocation of the Twickenham Area Action Plan - Site TW7 (Twickenham Riverside (Former Pool Site) and south of King Street).

2.4 Our client's site adjoins 1, 1A, 1B King Street and 2/4 Water Lane, and faces onto Jubilee Gardens. The neighbouring properties, with the exception of Jubilee Gardens, are the subject of redevelopment proposals promoted by the London Borough of Richmond upon Thames. These redevelopment proposals are known as the 'New Heart for Twickenham'. Our client has previously made representations to the Council's consultation on the 'New Heart of Twickenham' (December 2016).

3. RICHMOND LOCAL PLAN

3.1 Our client welcomes the preparation of the Richmond Local Plan. In particular our client welcomes the Council's

commitment to meet the development needs of the borough in full through a plan-led approach.

3.2 The following representations to the Richmond Local Plan assess whether the Council's vision, objectives and policies are 'sound' under the provisions of the National Planning Policy Framework.

Strategic Vision

3.3 The Council's 'Strategic Vision' reflects the vision for the development of the borough over the plan period (up to 2033). The 'Strategic Vision' is therefore at the heart of the Richmond Local Plan.

3.4 In accordance with the objectives of the NPPF and London Plan (2016), the 'Spatial Vision' seeks to meet the development needs of the borough through promoting sustainable development that protects the 'unique' character of the borough. Our client welcomes the commitment to meeting the development needs of the borough whilst protecting the 'unique' character of the borough.

3.5 In particular our client supports the Council's approach to promoting sustainable development and focusing development towards the existing main centres within the borough (i.e. Twickenham Town Centre). It is strongly contended that only by focusing higher density and larger scale development within existing centres will the Richmond Local Plan deliver the Council's 'Strategic Vision' of maintaining the borough's 'unique' character whilst at the same time meeting the borough's development needs.

3.6 Overall the 'Strategic Vision' of the Richmond Local Plan reflects the overarching objectives of the NPPF and London Plan (2016). Consequently, if the Richmond Local Plan is to be found 'sound' its policies must facilitate the delivery of the Council's 'Strategic Vision' as well as the objectives of the NPPF and London Plan (2016).

4. CONCLUSIONS

4.1 Our client welcomes the Council's preparation of the Richmond Local Plan, and the 'Strategic Vision' and 'Strategic Objectives' that are at the heart of the Richmond Local Plan. Indeed, our client welcomes the Council's commitment to meet the development needs of the borough.

4.2 However, our client concludes that those policies of

										<p>the Richmond Local Plan are not consistent with the National Planning Policy Framework, London Plan (2016) or the Government's recent Housing White Paper (February 2017), and therefore in their current form these policies are not 'sound'.</p> <p>4.3 Our client has therefore taken this opportunity to suggest amendments to policies of the Richmond Local Plan, which if made, will ensure that the Richmond Local Plan is consistent with the National Planning Policy Framework, London Plan (2016) and Government Housing White Paper (February 2017). Should these suggested amendments be made to the Richmond Local Plan our client will be able to conclude that the Richmond Local Plan is 'sound'.</p> <p>4.4 As a key existing landowner within the borough our client wishes to be kept fully informed in relation to the future progress of the Richmond Local Plan, and requests the opportunity to make formal representations to the Examination in Public of the Richmond Local Plan.</p> <p>See Publication Local Plan Comment IDs 410, 411, 412, 413, 414, 415, 416, and 417</p>		
9	272	Reverend Dominic Stockford	Paragraph: 2.2.1.3	Yes	No	No				<p>It doesn't provide for the needs of older people in Teddington.</p>	<p>2.2.1.3 speaks of required facilities which will help the local community In Teddington there is a desperate need for habitation for older residents who are downsizing, wish to stay in the area, and who will need a variety of needs provided for on site. The proposals in Teddington by the Quantum group produce exactly this. What is more, they will also provide a guaranteed sports facility, run by local people and owned by local people. NOT to do this will cause further hardship as more older people are forced out of the area at the most needy moments of their life.</p>	<p>Comments noted. No changes required. It is considered that the Local Plan's Strategic Objectives (Page 16-17) address the issue of Meeting People's Housing Needs, particularly "Meeting People's Needs - Objective 3." More specifically Policy LP 37: Housing Needs of Different Groups and its associated reasoned justification at paragraph 9.4.2 relates specifically to housing provision for older residents.</p> <p>It is not the role of the plan-making process to assess a potential development, such as that proposed by the Quantum Group, against the Local Plan, London Plan and national policies as this will have to be done as part of the normal planning application process. Also see the Officer response in the separate Proposal Map Changes document in relation to Comment ID 4.</p>

340	113	Katharine Fletcher, Historic England	Paragraph: 2.2.1 The Local Plan Strategic Vision Page: 12						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. 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). These comments are made in the context of the principles in the NPPF and accompanying PPG. We welcome the clear commitment in the publication plan to conserving and enhancing Richmond's exceptional historic environment. The comments we have made in the attached schedule are mainly to ensure clarity and alignment with the approach in the NPPF.	<u>2.2.1, p12 – Local Plan Strategic Vision</u> We welcome the reference here to RBG Kew World Heritage Site. The borough's historic parks and gardens should also be encompassed, and we recommend the following change: ' <u>Heritage assets, including</u> listed buildings, conservation areas, <u>historic parks</u> as well as Royal Botanic Gardens World Heritage Site'	It is considered that the suggested minor change will help to clarify the important role that heritage assets play in defining the character of the borough and ensure that this is captured within the Strategic Vision. The following minor change is proposed to Section 1 of the Local Plan Strategic Vision (Page 12, paragraph 2.2.1) to read as follows: " <u>Heritage assets including listed buildings and Conservation Areas, historic parks, as well as Royal Botanic Gardens, Kew World Heritage Site ...</u> "
380	70	James Togher, Environment Agency	The Local Plan Strategic Vision - Natural environment, open spaces and the borough's rivers & Consultation on the final version of the Local Plan ('Publication') [General]	Yes	Yes				<p>Thank you for consulting the Environment Agency. We support the Publication local plan and believe the plan is based on a sound environmental base and the Duty to co-operate process which has helped to inform the local plan vision, strategic objectives and policies.</p> <p>We are pleased to see how the local plan has evolved and the importance placed on protecting and enhancing Richmond's unique environmental quality and maximising opportunities to continually improve the environment for people and wildlife.</p> <p>We support the vision to protect and enhance the environment across the borough and how river corridors are included as a key element of the green infrastructure network across the borough. Increasing levels of flood risk and extreme weather events due to climate change show the importance of "making space for water" and an integrated approach to water management and working across river catchments to manage environmental issues and opportunities.</p> <p>Natural environment, open spaces and the borough's rivers - <i>The outstanding natural environment and green infrastructure network, including the borough's parks and open spaces, biodiversity and habitats as well as the unique environment of the borough's rivers and their corridors will have been protected and enhanced where possible. Residents will continue to highly value and cherish the borough's exceptional environmental quality.</i> (page 13)</p> <p>We welcome the local plan policies on environmental management, biodiversity, moorings and floating structures, water quality, water resources, climate change and sustainable design and construction.</p>		The Environment Agency's comments are noted and support for the Plan's enhancement of Richmond Borough's unique environment for people and wildlife is welcomed.

										<p>We are keen to work with you when you begin the review of the Community Infrastructure Levy (CIL) and Section 106 lists to ensure flood defence infrastructure and environmental improvements are listed to ensure funding to deliver the required infrastructure across the borough.</p> <p>We welcome the updated Local Plan key diagram (page 26) now showing all the rivers and river corridors across the borough and supporting local plan policies to ensure improvements to rivers and flood risk are considered early in the planning process. We support the updated Strategic Flood Risk Assessment (May 2016) which has been used to inform the flood risk policies and site allocations. As you are aware it's essential the environmental evidence base and delivery of local plan policies is regularly reviewed to ensure the data and environmental mapping is up to date and policies relevant. For the latest environmental data sets and maps view the link below</p> <p>http://environment.data.gov.uk/ds/partners/index.jsp#/partners/login</p> <p>The evidence base should also be regularly reviewed to take account of updated climate change allowances, new flood alleviation schemes or reports produced on lessons learned from major flood events.</p> <p>We look forward to working in partnership with you to help deliver the new local plan vision, objectives and policies. To help deliver these new planning policies we encourage developers to contact us for early pre application discussions to help deliver these policies and complete a pre application enquiry form and email back to kslplanning@environment-agency.gov.uk</p>		
203	118	James Stevens, Home Builders Federation Ltd	Strategic objectives							<p>In light of the significant undersupply against assessed need we consider that the strategic objective 3 under the heading <i>Meeting People's Needs</i> is misleading because the Council will clearly not be providing an adequate supply of new housing to <i>"ensure a suitable stock and mix of high quality housing that reflects local needs by providing a choice of housing types and sizes"</i>.</p>	<p>This objective should be deleted, or else it should be amended to provide a more honest reflection of what the situation will be in Richmond Upon Thames over the next 15 years, namely:</p> <p><i>"The borough will become an expensive place to live, occupied, increasingly, by only the most affluent."</i></p> <p>The NPPF reminds as the Plans should be aspirational but they must also be realistic.</p>	<p>The Council considers that the Plan meets the tests of soundness and that it is consistent with national policy and guidance.</p>

323	227	Jabed Rahman, Public Health, London Borough of Richmond	Paragraph: 2.3 Strategic Objectives Section: Meeting People's Needs Page: 17	Yes	Yes	Yes					See also Publication Local Plan Comment ID 322	Page 17, Meeting people's needs "Encourage the creation of healthy environments <u>through consideration of design and community engagement at the earliest stages</u> and support healthy and active lifestyles, including through measures to reduce health inequalities. This includes ensuring there is an appropriate range of health facilities that meet local needs, and tackling childhood obesity by restricting access to unhealthy foods, particularly fast food takeaways, in proximity to schools."	Comments noted. This is considered to be adequately addressed in Policy LP 30 (Health and Wellbeing), which requires a Health Impact Assessment to be submitted with major development proposals. No changes required.
410	73	James Cogan, GL Hearn on behalf of Evergreen Investment Retail Company	Paragraph: 2.3 Strategic Objectives		Yes						See also Publication Local Plan Comment ID 409 - for preamble and introductory text to this representation Strategic Objectives 3.7 Those 'Strategic Objectives' of the Richmond Local Plan outline the key objectives required to successfully deliver the Council's 'Strategic Vision', as well as the overarching the objectives of the NPPF and London Plan (2016). Therefore the 'Strategic Objectives' should promote sustainable development that meets the development needs within the borough whilst maintaining the 'unique' character of the borough. 3.8 Overall our client welcomes those 'Strategic Objectives' of the Richmond Local Plan which seek to <i>'optimise the use of land and resources by ensuring new development takes place on previously developed land'; 'ensure there is a suitable stock and mix of high quality housing that reflects local needs by providing a choice of housing types and sizes, with high density development located in more sustainable locations, such as the borough's centres'; and 'reinforce the role of Richmond, Twickenham, Teddington, Whitton and East Sheen centres, which play an important role in the provision of shops, services, employment and housing'.</i> 3.9 In particular our client supports the Council's objective to <i>'optimise the use of land'</i> and the acknowledgement of the role that <i>'high density development located in more sustainable locations, such as the borough's centres'</i> will perform in sustainably meeting the development needs of the borough. 3.10 These 'Strategic Objectives' of the Richmond Local Plan are consistent with the overarching objectives of the NPPF and London Plan (2016), and are therefore considered to be 'sound'. 3.11 The policies of the Richmond Local Plan are therefore assessed against whether they facilitate the delivery of the	Support for the Local Plan Strategic Objectives is welcomed. No changes required.	

											Council's 'Strategic Vision' and reflect the 'Strategic Objectives'.		
10	272	Reverend Dominic Stockford	Paragraph 2.3.1.5	Yes	No	No					The requirement for the plan states: "Ensure there continues to be good provision of, and access to, shopping and other local services and facilities that meet the needs of our communities." The plan regarding Udney Park Playing Fields does NOT meet the need of our local community - specifically the need of the older people, for whom there is desperate need for local move on housing, where they can have a variety of their needs met, and remain within their community of friends and support structures. Making it a protected green space will do nothing except preserve the current view of a handful of privileged people, whilst once again preventing the production of a suitable housing facility for the older people of our community.		Comments noted. No changes required. See Officer response to Comment ID 9 above and Comment ID 324 below.
16	25	Richard Beasley	Local Plan Proposals Map Changes An alternative approach		No			Yes			I do not support the changes to the Local Plan policy whereby the land at Udney Park Road, Teddington is to be designated as Local Green space, because I believe this could lead to the public being denied access to and use of this land. I very much like the scheme proposed by Quantum Group as it offers much-needed retirement and continuing care accommodation, while leaving the majority of the site for sport, recreation and community use. I have lived in Teddington for nearly 50 years and our children attended local schools, including Bridgeman and Collis. I am surprised that I have not been consulted on this application before. I do not believe that the groups making this application represent the the community as a whole, and they certainly do not represent my views. This land has never been in the public domain, and Quantum's proposals would rectify this by providing a balanced development of much-needed homes and facilities with sporting facilities accessible to the community at large. Designating the area as Local Green Space could well prevent this.	Udney Park Playing Fields should be removed from the proposals map as a site that should be designated as Local Green Space. New site allocation ref.475 should be proposed instead as it will be a beneficial development benefitting the community as a whole.	Comments noted. No changes required. See Officer response to Comment ID 9 above and Comment ID 324 below. Also see the Officer response in the separate Proposal Map Changes document in relation to Comment ID 4.
295	101	Kevin Rice, Hampton Society Planning Sub group	3 Spatial Strategy - Housing section para 3.1.36								In the Housing Section, paragraph 3.1.36 states a total of 650-700 new residential units for Teddington & the Hamptons. I presume this is for the 10 year period from 2015? Can you clarify the sub-total for Hampton as defined in the Village Plan, both for main stream housing and any affordable or social housing provision. In our view the Village subtotals used in the LP process should be communicated to the individual Villages as part of the on-going VP process.		Comments noted. No changes required. The figures refer up to 2025, as also set out within Policy LP 34 of the Plan.

223	109	Francis McInerny, Heatham Alliance	Advertisements and hoardings (4.1.14 - 4.1.16)							<p>1. This document should acknowledge that the policy is subject to the Town and Country Planning (Control of Advertisements) Regulations 2007, i.e. supplementary to and not replacing the regulations.</p> <p>2. 'Temporary nature' needs to be clarified in terms of overall permitted start and end dates and the duration of displays within the permitted period. Some advertisements are 'temporary' because they are erected for a period over a Twickenham match day weekend but these should not be permissible in a residential setting.</p> <p>3. 'Demonstrable harm' also needs to be clarified so as to widen its applicability e.g. in relation to large advertisements and banners, the number of such advertisements and banners, the locality and siting, e.g. on external railings in a predominantly residential street.</p>	<p>Comments noted. No changes required. In relation to 1., in the interests of retaining the longevity of the Plan, it is not considered necessary to refer to specific regulations and guidance, and the reference in paragraph 4.1.14 is considered sufficient. In relation to 2. and 3., it is considered that the terminology as included within the Policy is sufficient and appropriate as matters relating to 'temporary' and 'harm' will need to be assessed on a case by case basis.</p>
224	109	Francis McInerny, Heatham Alliance	Building Heights (4.2)							<p>4. The new policies should be fair and unambiguous but the current document does not always meet these criteria. For example, this document describes appropriate building heights as those (quote) reflecting the prevailing building heights within the vicinity. The vicinity is an ambiguous term capable of different interpretations in relation to distance from proposal sites, so guidelines are necessary taking account of the context and the intervening landscape. This would help to ensure the criteria are demonstrably fair to the local community and to people who live and work in attractive, low to medium-rise areas in the borough.</p> <p>5. The term public realm benefits and ground floor public access are capable of different interpretations as well. Guidelines are needed to ensure clarity and objectivity giving proper and effective restrictions on 'taller' or 'tall' public buildings.</p> <p>6. The document recognises that the borough is characterised primarily by low to medium-rise residential development patterns, which has produced very attractive townscapes that are important to the borough's distinctive character. The use of rather loose terms in relation to appropriate building heights and exceptional sites weigh in favour of development of 'taller' or 'tall' buildings at the expense of neighbourhoods with attractive, distinctive character. Harm should specifically include harm to the character of the neighbourhood.</p> <p>7. In general Twickenham town centre is a mix of two, three and four storey residential and business premises. One exception is Queen's House in Holly Road which is nine storeys high and stands out like a sore thumb.</p>	<p>Comments noted. It is considered that the terminology as included within Policy LP 2 is accurate, sufficient and appropriate, and does not need to be clarified further as suggested in items 4, 5 and 6 of the representation. This is because the policy needs to allow for flexibility and for assessment on a case by case basis. Point 1 of Policy LP 2 specifically states that buildings need to make a positive contribution towards the local character. In addition, paragraph 4.2.6 specifically requires a positive contribution to the streetscape, delivering wider public realm benefits (which could include for example making a currently inaccessible area accessible to the public). It should be noted that point 7 (existing buildings setting precedent) is covered in paragraph 4.2.7, and point 8 (townscape appraisal) is adequately addressed in paragraph 4.2.6. Community consultation would be carried out as part of any planning application.</p> <p>In relation to points 9 and 10 (Richmond College), this refers to Richmond <u>upon Thames</u> College - a minor change is proposed in this regard to ensure it is clear to which site this refers to. This reference will be updated in all other areas of the Plan, including paras 3.1.39, 3.1.41, 5.7.4, 8.2.11 and 13.1.7. It should</p>

									<p>Queen's House, the RFU's Twickenham Stadium and 'taller' or 'tall' public realm buildings must not set a precedent for future development.</p> <p>8. Any 'taller' or 'tall' building proposal should be accompanied by a comprehensive townscape appraisal that describes the present configuration and use of the site and additionally by an appropriate community consultation.</p> <p>9. This document refers to Richmond College. Please clarify. Note that Richmond University - or Richmond, The American International University (Queens Road, Richmond) - is and has been known as Richmond College. There is often confusion between Richmond upon Thames College (RuT College) in Egerton Road, Twickenham, and Richmond Adult and Community College (RACC) in Parkshot, Richmond.</p> <p>10. The statutory planning process for a development proposal at RuT College has been in progress since 2015 and is still ongoing, so it is not proper that this document should state a guideline that RuT College is a specific and exceptional site where 'taller' or 'tall' buildings may be appropriate. That conclusion is not supported by any proper, factual appraisal given in this document.</p>	<p>be acknowledged that bullet point 4 of paragraph 4.2.2 lists some sites outside of centres where there are already existing 'tall' or 'taller' buildings.</p>
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226	49	Rob Shrimplin, Shrimplin Brown on behalf of CLS Holdings Plc	Policy LP2 Building Heights	No	Yes	Yes	Yes	Yes	<p>1. These representations to the London Borough of Richmond upon Thames Local Plan consultation are made on behalf of CLS Holdings Plc. CLS Holdings Plc recently acquired Harlequin House, 7 High Street, Teddington, TW11 8EE, a 6/7 storey office building. The building was constructed in the early 1980s and is now nearing the end of its life. It does not meet the requirements of modern business and its fabric and specification, in particular the location of the entrance and service cores, make it uneconomic to refurbish or adapt. It is of little architectural merit.</p> <p>2. The building falls within Teddington District Centre and the Teddington Conservation Area (Conservation Area 37). The building is covered by an Article 4 Direction removing Permitted Development Rights for Change of Use from offices to residential.</p> <p>3. Harlequin House is taller than buildings in the surrounding vicinity, although it is separated from its neighbours and set back from the main road behind a small green containing a number of mature trees that is designated as 'Other Open Land of landscape importance' (adopted Local Plan Policy DMOS3).</p> <p>4. The building is proposed to be allocated within the "Teddington and Waldegrave Road" Key Office Area under Policy LP41 Offices.</p> <p>5. An extract from the adopted Local Plan Proposals Map and photos of the existing building are provided at Appendix 1 to these representations. See Appendix (2) to this document for Appendix 1 plan and photos.</p> <p>6. This representation is to proposed Policy LP2 Building Heights. It analyses the Policy and conclude that a change is needed to make the proposed Policy Sound, namely:</p> <ul style="list-style-type: none"> • Support the intensification/redevelopment of existing taller buildings, including the potential for additional storeys, subject to the criteria set out in the policy. <p>7. In order to meet identified needs it is important that the Local Plan seizes upon the potential to intensify/redevelop existing office buildings/sites. This is an inherent part of the Local Plan's "Strategic Objectives" which, in order to create "A Sustainable Future", seeks to:</p> <p>"Optimise the use of land and resources by ensuring new development takes place on previously developed land, reusing existing buildings and encouraging remediation and reuse of contaminated land"</p> <p>8. It is also inherent to Policy LP41 which seeks to deliver a net increase in office floorspace on new developments the majority of which, as the evidence base makes clear, are likely to come forwards through intensification/redevelopment of existing office buildings/sites. If this is to be achieved Policy LP2 needs to allow the possibility to consider an increase in height</p>	<p>Change sought</p> <p>13. Additions in bold, deletions struck through: 8. Support the intensification/redevelopment of existing taller buildings, including the potential for additional storeys, subject to the criteria set out in this policy.</p>	<p>Comments noted. It is considered that Policy LP2 is sound and based on robust and credible evidence. Whilst it is noted that the policy refers specifically to 'new buildings', it would also allow assessment of proposals for intensification and redevelopment of existing 'tall' or 'taller' buildings. In particular, the intention of the policy is that if a redevelopment were proposed, improvements to the existing architectural design quality would be sought, as well as public realm benefits and the impact on the character and quality of the area would be assessed. A minor change is therefore proposed to ensure that this point is clarified as follows: "The Council will require new buildings, <u>including extensions and redevelopment of existing buildings</u>, to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights, by the following means..."</p>
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										<p>when intensifying/redeveloping existing office buildings.</p> <p>9. The supporting text to Policy LP2 at paragraph 4.2.2 does recognise this, stating that in Teddington “taller buildings” can be “...considered in locations where there are currently existing ‘tall’/‘taller’ buildings”. However, without specific reference to this in the main text of the Policy the weight that can be attached to this in decision making risks being limited.</p> <p>10. However, the supporting text to the Policy at paragraph 4.2.7 runs contrary to the all of this, suggesting that: “existing tall or taller buildings should not be used as a precedent for allowing further, or replacement, tall or taller buildings where the existing ones are harmful to the townscape or amenity”.</p> <p>11. Owners will clearly not promote replacement of a building if, after spending the money on the project, the result is a less valuable asset. The supporting text therefore risks preventing schemes coming forward which, as well as having significant benefits in terms of providing modern floorspace in accordance with other objectives/policies of the Plan, will also improving the townscape and amenity.</p> <p>12. It is important to note that there is no evidence base to support the approach set out in paragraph 4.2.7. The Council’s Sustainable Urban Development Study (September 2008) is a strategic, Borough-wide assessment about where <u>new</u> tall buildings may be appropriate. It does not offer any guidance on how to deal with the intensification/redevelopment of existing office buildings/sites.</p>	
308	189	Shaun Lamplough, Mortlake with East Sheen Society	4. Local Character and Design New Policy LP 2: Building Heights Page 32, para 4.2.2							<p>MESS comments on Pre-Publication Local Plan, August 2016 - We note the reference to tall or taller buildings being possibly appropriate at inter alia the Stag Brewery site in Mortlake subject to the criteria set out. Council’s response to MESS comments, January 2017 - Noted.</p> <p>MESS comments on Publication Local Plan, February 2017 - It is understood there may be a tall building proposed on the Stag Brewery site and MESS will reserve its judgment on this when the plans are exhibited.</p>	Comments noted. No changes required.
341	113	Katharine Fletcher, Historic England	Policy: LP 2 Building Heights Paragraph: 4.2.8 Page: 33							<p>See Publication Local Plan Comment ID 340</p> <p>Should you wish to include a reference to Historic England’s updated advice note this is entitled <i>Tall Buildings: Historic England Advice Note 4, Dec 2015</i> (Historic England’s Advice Note 4, Tall buildings, is available at: https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/).</p>	The Advice Note is already referred to in paragraph 4.2.8. It is considered that this reference is sufficient. No changes required.

11	272	Reverend Dominic Stockford	Policy LP 3 Designated Heritage Assets	Yes	No	No					To arbitrarily be able to extend 'conservation zones' in order to 'preserve' buildings exactly as they are fails to allow for local needs, the needs/abilities of owners of such buildings, or for the need for the community to be able to change and grow according to local need. The ability of the council to do this, and the determination to do this, fails to operate a proper system of co-operation with building owners, or with the needs of the local community.	It is considered that Policy LP3 Designated Heritage Assets is consistent with national policy and guidance. No changes required. It should be noted that a public consultation process, including with affected landowners, takes place whenever the Council proposes to extend conservation areas.	
342	113	Katharine Fletcher , Historic England	Policy: LP 3 Designated Heritage Assets Page: 33								See Publication Local Plan Comment ID 340	<p>While we welcome the key elements in this policy there is a danger that some aspects of the historic environment may be perceived as not being covered sufficiently clearly. This might be rectified by restructuring, and by ensuring that historic parks and gardens and scheduled monuments are given greater visibility. This could be achieved as follows:</p> <ul style="list-style-type: none"> - Provide a general section/introduction (including point 1) for all heritage assets and a separate section dealing with listed buildings - Include a new part referring to the conservation and, where appropriate, enhancement of historic parks and gardens, including the designed features, historic structures and views that contribute to their significance. It would be suitable to list the registered historic parks and gardens within the Borough in the supporting text. The historic significance of Richmond's open spaces is not covered in the Green Infrastructure policies in chapter 5, and it is important that this dimension is brought out in chapter 4. - Include a new part referring to the conservation of scheduled monuments and their settings, and other nationally significant sites and monuments that may be identified in future. - In existing part 2, in order to reflect paras 132 and 133 of the NPPF we suggest this is amended to read '<i>...a thorough assessment of the justification for the proposal and <u>the significance of the asset.</u></i>' - We welcome the inclusion of Part E describing how the Council will have regard to its strong evidence base for assessing proposals in conservation areas. - Within the supporting text, para 4.3.8, we recommend that the bullet points in the paragraph are deleted as these repeat parts of the policy and again are in danger of dealing with a mixture of heritage assets, to the exclusion of others. In the place of these bullets we recommend that a new sentence could be added to the end of para 4.3.8, as follows: '<i>...weighed against wider public benefits that might result from the proposal in accordance with paragraphs 132 to 134 of the NPPF.</i>' 	<p>Comments noted. In relation to historic parks and gardens, they are already explicitly referred to under Designated Heritage Assets (Section A) of Policy LP 3 as follows: "The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, Listed Buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced by the following means ..." (bold text is Council's emphasis) Therefore, the significant restructuring to introduce a new section on historic parks and gardens is not considered necessary.</p> <p>Historic England's proposed minor amendment to bullet point 2 of Policy LP 3 may provide a useful clarification and the following minor change is proposed: "Consent for demolition of Grade II Listed Buildings will only be granted in exceptional circumstances and for Grade II* and Grade I Listed Buildings in wholly exceptional circumstances following a thorough assessment of the justification for the proposal and <u>the significance of the asset.</u>"</p> <p>The Council considers that the proposed amendments to paragraph 4.3.8 are unnecessary as they repeat National Planning Policy.</p>

2	244	Jon Rowles	Paragraph 4.3.7	No	No	No			<p>Local planning authorities should set out in their local development plan a positive strategy for the conservation of heritage assets most at risk through neglect, decay or other threats: Paragraph 126, National Planning Policy Framework, Department for Communities and Local Government, March 2012. I cannot see any 'positive strategy' in this draft local plan, as it has restricted itself with dealing with planning applications in the main and is thus predominately a reactive strategy.</p> <p>Historic England on their website state (https://historicengland.org.uk/advice/hpg/has/conservation-areas/#(2)) "Local planning authorities are obliged to designate as conservation areas any parts of their own area that are of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance - section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (http://www.legislation.gov.uk/ukpga/1990/9/section/69) . Local planning authorities also have a duty to review past designations from time to time to determine if any further parts of their area should be conservation areas." This does not appear to be happening from 'time to time" as some Conservation Areas have not been properly reviewed in over twenty years.</p> <p>Heritage England also identified that there was a national problem of Conservation Areas not being pro-actively managed and wrote this document on the problem: Conservation Areas at Risk https://content.historicengland.org.uk/images-books/publications/Conservation_Areas_at_Risk/caar-booklet-acc.pdf/ which has many suggestions on how they can be managed and how to lessen the burden of managing large numbers of conservation areas.</p>	<p>(1) The council need to have a plan to firstly identify those heritage assets most at risk though neglect, decay or other threats. English Heritage London office used to have this responsibility before it was devolved to the London boroughs. They would keep condition reports of all listed buildings, and risk score them with the most at risk receiving more monitoring. Richmond Council never continued this monitoring when the responsibility was handed over, and are now reliant upon members of the public raising concerns. I have tried to raise concerns about listed building needing urgent repairs with the council the experience can be best described as 'hitting your head against a brick wall'. There are no procedures in place and most staff do not know who to refer the matter too and the council appear to make it as difficult as possible to raise a concern.</p> <p>(2) The council needs to review the conservation areas and develop management plans, that includes more than just planning issues but also other council departments like the highways department - as many Conservation Areas are currently damaged by insensitive road markings and too many unnecessary road signs and other street furniture.</p> <p>(3) The council needs to develop some system for democratic oversight by councillors over the process and ongoing monitoring of conservation areas and listed buildings. since the council has moved from a committee system to Cabinet led system the pro-active management of Conservation Areas appears to have stopped. Maybe the planning committee could have special meetings to consider conservation area and listed building matters once every three months?</p> <p>(4) having up-to-date management plans can also help identify who they could be enhanced by development, as some areas are blighted by poor quality buildings which is sensitively redeveloped would be a positive improvement and could help meet the other needs in the borough such as housing or the provision of employment space. Currently though the approach appears on the surface to stifle any change at all.</p>	<p>It is noted that the majority of the comments relate to the implementation and application of the policy. The Council considers that Policy LP 3 Designated Heritage Assets provides a robust policy framework for the protection and enhancement of the borough's Heritage Assets and is consistent with national policy and guidance. No changes required.</p>
12	272	Reverend Dominic Stockford	Policy LP 4 Non-Designated Heritage Assets	Yes	No	No			<p>"There will be a presumption against the demolition of Buildings of Townscape Merit."As giving a building 'Townscape merit' status is a decision made emotionally, and as presumption against demolition is in the end a decision upheld by one or two paid officers within the council (and is also emotionally driven), there is no due process, and forces owners with unsuitable and unusable buildings down legal paths that they cannot necessarily afford. It delays redevelopment of sites with failed buildings, and it takes all rights away from building owners.</p>		<p>Comments noted. No changes required. Note that the Council's Buildings of Townscape Merit Supplementary Planning Document, adopted in May 2015, sets out and describes the guidelines and criteria for designation as BTM.</p>

297	202	Peter Willan, Old Deer Park Working Group	Section 4: Local Character and Design THE ABSENCE OF REFERENCES TO THE OLD DEER PARK, RICHMOND: THE CROWN ESTATE LANDSCAPE STRATEGY (REFERENCES 113, 118, 448 AND 451)								<p>The Group notes with considerable regret the continuing resistance of the Council to include references to <i>The Old Deer Park, Richmond: The Crown Estate Landscape Strategy</i> under Policy LP 5 – Views and vistas, Policy LP 6 – Royal Botanic Gardens, Kew World Heritage Site, Site specific proposal SA 22 – Pools on the Park and surroundings, Old Deer Park, Richmond, and Site specific proposal SA 23 – Richmond Athletic Association Ground. Old Deer Park, Richmond. The Group does not accept the reasons stated by the Council for the continuing omission of references to this most important and still highly relevant conservation and planning document – not least, given the references to the similar <i>Royal Botanic Gardens Kew World Heritage Site Management Plan</i> and the <i>Royal Botanic Gardens Kew Landscape Management Plan</i>. Whilst the Group notes that the <i>Crown Estate Landscape Strategy</i> contains limited references to planning policies that have now been superseded in the very brief Section 10, the substantial part of the document remains highly relevant. There is no reason why references cannot be made to the document, with a brief note regarding the policies cited in Section 10.</p>	<p>Comments noted. No changes required. The Old Deer Park Landscape Strategy (1999) was commissioned by the Crown Estate, as landowner, ‘to develop estate management policies for their ownership of the Old Deer Park’ (Old Deer Park Landscape Strategy 1999 Summary). It is not a document that has been formally adopted by the Council for planning or other purposes and it is not known whether the Strategy is still being used for estate management purposes by the landowner. In addition, whilst the Strategy makes reference to planning policies, these have been superseded by subsequent planning policies adopted by the Council since its publication. The Council is currently preparing a Supplementary Planning Document for the Old Deer Park, which is being undertaken within the context of the Council’s planning policies. As the Strategy is a well-researched and informative document, it provides useful contextual information for the Council in the development of the Supplementary Planning Document with respect of the historic and ecological attributes of the Old Deer Park.</p>
204	118	James Stevens, Home Builders Federation Ltd	Policy LP5: Views and Vistas								<p>It would be helpful if the Council listed what these views and vistas are to facilitate planning decisions.</p>	<p>Comments noted. The views and vistas are identified on the Proposals Map for protection as set out under bullet point 1 of Policy LP 5 (Views and Vistas). No changes required.</p>
344	113	Katharine Fletcher, Historic England	Policy: LP 5 Views and Vistas Page: 37								<p>See Publication Local Plan Comment ID 340</p>	<p>We suggest the following changes: - In part 5) ‘<i>Seek improvements to views ...</i>’ - In part 6, we are not clear as to the meaning of part c) and would be pleased to discuss if we can be of assistance</p> <p>Comments noted. Whilst it is generally considered that this policy is clear, the following minor change to part 5 of LP 5 could be incorporated: “<i>Seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured.</i>”</p> <p>For clarification purposes, part 6 (c) relates to the wider setting of the Conservation Area and the impact of developments adjacent to Conservation Areas.</p>

345	113	Katharine Fletcher, Historic England	Policy: LP 6 Royal Botanic Gardens Kew World Heritage Site (WHS) Page: 38							See Publication Local Plan Comment ID 340	Policy LP 6 - Historic England welcomes the inclusion of this policy and strongly supports its content.	Support welcomed. No changes required.
299	202	Peter Willan, Old Deer Park Working Group	Policy: LP 6 Royal Botanic Gardens Kew World Heritage Site (WHS) THE WORDING OF POLICIES LP 6, LP 13 AND 14 (REFERENCES 118, 159, 168)	No						The Group notes with considerable regret the continuing resistance of the Council to amend the wording under Policies LP 6, 13 and 14 as urged by the Group in its formal submission of August, 2016. The Group does not accept the reasons stated by the Council for rejecting such amendments and believes that the present wording remains unsound.		See Officer response above to Comment ID 297 above.
135	246	Lucy Mills, Montagu Evans LLP on behalf of Royal Botanic Gardens Kew	Policy: LP 6 Royal Botanic Gardens Kew World Heritage Site (WHS)							On behalf of our client, Royal Botanic Gardens Kew, we write to submit representations pursuant to the London Borough of Richmond upon Thames Local Plan Publication Version. The Royal Botanic Gardens at Kew are unique and have a significant role within the Borough and at a regional, national and international level, as a designated World Heritage Site. We are therefore strongly supportive of the objectives of the draft Local Plan objectives, which acknowledges the role of the Gardens within the Borough and seeks to enhance the Gardens and their wider setting. Notwithstanding, we submit these representations to ensure that planning policies relating to Kew, namely Policy LP6, is practically workable and in accordance with the National Planning Policy Framework (2012). Background to the Representations Policy LP6 of the 8th July – 19th August 2016 Pre-Publication Version of the Local Plan, read: <i>The Council will protect, conserve, promote and where appropriate enhance the Royal Botanic Gardens, Kew World Heritage Site, its buffer zone and its wider setting. - The highest significance in terms of importance as a designated heritage asset is attributed to Royal Botanic Gardens, Kew World Heritage Site. - Development proposals should not cause any adverse impact to the World Heritage Site or its setting that would compromise its outstanding universal Value, integrity, authenticity and significance - Appropriate weight will be given to the Royal Botanic Gardens, Kew World Heritage Site Management Plan and the Royal Botanic Gardens, Kew Landscape Master Plan.</i> Following public consultation, Policy LP6 was amended for the 4 January - 15 February 2017 Publication Version of the Local Plan, to read: <i>The Council will protect, conserve, promote and where appropriate enhance the Royal Botanic Gardens, Kew World Heritage Site, its buffer zone and its wider setting. In doing this, the Council will take into</i>	Notwithstanding, we consider that the protection, conservation and enhancement of the World Heritage Site is most effectively detailed within the Royal Botanic Gardens, Kew World Heritage Site Management Plan and the Royal Botanic Gardens, Kew Landscape Master Plan. We therefore consider that the plans should become more embedded within the development plan, which in turn would render the second bullet point superfluous. We therefore suggest that the Policy reads as follows: <i>The Council will protect, conserve, promote and where appropriate enhance the Royal Botanic Gardens, Kew World Heritage Site, its buffer zone and its wider setting. In doing this, the Council will take into consideration: - The World Heritage Site inscription denotes the highest significance to the site as an internationally important heritage asset; and - The management of the World Heritage Site should be carried out in accordance with the Royal Botanic Gardens, Kew World Heritage Site Management Plan and the Royal Botanic Gardens, Kew Landscape Master Plan, and any superseding plans subject to their full public consultation.</i> Closing Royal Botanic Gardens Kew broadly welcomes the publication of this document and hopes that the above recommendations will be taken into consideration so as not to preclude the opportunity for the Gardens to pursue their longer term Estates Strategy to secure future of the Gardens.	Comments noted. It is considered that Policy LP 6 (Royal Botanic Gardens, Kew World Heritage Site) and the reasoned justification set out at paragraphs 4.6.1 to 4.6.4, provide a robust policy framework to ensure its protection, conservation and enhancement. This includes specific reference to the Site Management Plan and Landscape Master Plan. Also note that the Council has worked closely with Historic England to agree the wording of this policy to ensure it protects, conserves, promotes and where appropriate enhances the Kew World Heritage Site. No changes required.

										<p>consideration that: - The World Heritage Site inscription denotes the highest significance to the site as an internationally important heritage asset. - The appreciation of the Outstanding Universal Value of the site, its integrity, authenticity and significance, including its setting (and the setting of individual heritage assets within it) should be protected from any harm. - Appropriate weight should be given to the Royal Botanic Gardens, Kew World Heritage Site Management Plan and the Royal Botanic Gardens, Kew Landscape Master Plan. The reworking of the policy is commended. It retains the fundamental principle to protect, conserve and enhance the Gardens, yet seeks to reflect national guidance on designated heritage assets, particularly in relation to the balance between harm and benefits.</p>		
346	113	Katharine Fletcher , Historic England	Policy: LP 7 Archaeology Page: 40							<p>See Publication Local Plan Comment ID 340</p>	<p>We strongly support proposed policy LP 7. However, in order to ensure its effectiveness it is important that:</p> <ul style="list-style-type: none"> - the Archaeological Priority Areas (APAs) are clearly defined, and that a map is accessible within the local plan. We have been unable to locate the Archaeological Constraints Map referred to – where can this be found and does this show the APA boundaries? - the site allocations within the local plan that fall within, or partially within, APAs should be identified within the site parameters listed under each site in Chapter 12. We have identified the relevant sites in our later comments for each allocation. Please see attached schedule for a full list of other sites lying within APAs, including those in Appendix 6 (See Appendix (8) to this document for the schedule of GLAAS comments) 	<p>Comments noted. Paragraph 4.7.3 of the reasoned justification to Policy LP 7 provides clarity on the Archaeological Priority Areas and states that they are currently due to be reviewed by GLAAS and that the Council will provide a link to the latest available APAs constraints map. The Council will include the link in the Adopted version of the Local Plan. In the meantime it will be made available on the Council's website. A minor change is proposed to paragraph 4.7.3 as GLAAS have confirmed that the APA review will now take place in 2017 rather than 2018: "The borough's APAs are due to be reviewed in <u>2017</u> by GLAAS as part of a rolling programme of reviews across London."</p>

293	237	Neil Henders on, Gerald Eve LLP on behalf of Reselton Properties Ltd	Policy LP 8 - Amenity and Living Conditions	No	No	Yes			Yes	<p>See also Publication Local Plan Comment ID 294</p> <p>See Appendix 19 in this document for a copy of their Pre-Publication Consultation Representation submission.</p>	<p>We were disappointed to note that the draft Policy wording has not been amended in respect of part 2. We highlight again that we consider the Council's requirements to be overly onerous and above guidance as set out within the Mayor's Housing SPG.</p> <p>Notwithstanding this, we welcome the Council's acknowledgment in the Council's response that there may be instances where the Council's minimum separation distances will not be achieved. The draft Policy wording, however, does not offer sufficient flexibility for these site-specific circumstances to come forward. Therefore, it would be entirely appropriate for part 2 of the draft Policy be amended to read:</p> <p>"ensure there is a minimum distance of 20 metres between main facing windows of habitable rooms (this includes living rooms, bedrooms and kitchens with a floor area of 13sqm or more) to preserve the privacy of existing properties affected by the new development, <u>unless exceptional circumstances can be demonstrated which require a smaller separation distance;</u>"</p>	<p>Comments noted. The policy sets out the minimum standards that the Council would expect applicants to follow and comply with. The main reason for the 20 metres distance is to ensure that new development does not infringe on the privacy, daylight and sunlight of adjacent properties nor that of the intended occupiers. Separation distances can be reduced to 13.5 metres where principal windows face a wall that contains no windows or those that are occluded (such as bathrooms), and this is recognised in the policy's supporting text (paragraph 4.8.8). It should also be noted that some of the borough's more historic places are characterised by intimate pedestrian lanes and courtyards of less than 20 or indeed 13.5 metres between frontages. Development would not be precluded in those areas, but would need to be considered on a site by site basis. The policy acknowledges that there may be site specific circumstances that could prevent the separation distances to be achieved; paragraph 4.8.8 recognises that a lesser distance may be acceptable in some circumstances. Such circumstances would then be considered on a site by site basis. No changes required.</p>
411	73	James Cogan, GL Hearn on behalf of Evergreen Investment Retail Company	Policy: LP 8 Amenity and Living Conditions		No				Yes	<p>See also Publication Local Plan Comment ID 409 - for preamble and introductory text to this representation</p> <p>Policy LP 8 - Amenity and Living Conditions</p> <p>3.12 Policy LP 8 seeks to ensure the residential amenity enjoyed by existing and future residents. Whilst our client welcomes the commitment to ensuring residential amenity and living conditions through Policy LP 8, our client is concerned that some of the specific requirements of Policy LP 8 will have the effect of restricting opportunities for development within the borough.</p> <p>3.13 In particular it is strongly contended that the requirement to <i>'ensure there is a minimum distance of 20 metres between main facing windows of habitable rooms'</i> will severely restrict opportunities for the effective and efficient reuse of previously developed sites in meeting the development needs of the borough.</p> <p>3.14 In this regard it is contended that Policy LP 8, as</p>	<p>3.15 Our client therefore requests that Policy LP 8 of the Richmond Local Plan be amended to provide sufficient flexibility to allow innovative architectural solutions that will facilitate higher density development in urban areas. This additional flexibility is in accordance with the objectives of the NPPF, London Plan (2016) and Housing White Paper <i>'Fixing our broken housing market'</i> (February 2017). Our client suggests that Policy LP 8 of the Richmond Local Plan be amended as follows:</p> <p>See Appendix (5) to this document for a 'marked-up' version of the proposed amendments to Policy LP 8</p>	<p>Comments noted. The policy sets out the minimum standards that the Council would expect applicants to follow and comply with. The main reason for the 20 metres distance is to ensure that new development does not infringe on the privacy, daylight and sunlight of adjacent properties nor that of the intended occupiers. Separation distances can be reduced to 13.5 metres where principal windows face a wall that contains no windows or those that are occluded (such as bathrooms), and this is recognised in the policy's supporting text (paragraph 4.8.8). It should also be noted that some of the borough's more historic places are characterised by intimate pedestrian lanes and courtyards of less than 20 or indeed 13.5 metres between frontages. Development would not be</p>

									<p>currently worded, does not allow innovative solutions to be adopted with regards to ensuring the amenity of future and existing residents. Indeed current Policy LP 8 stifles development within 20 metres of existing habitable rooms. Our client therefore contends that Policy LP 8 is inconsistent with paragraph 60 of the NPPF which states <i>'Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles'</i>.</p> <p>3.15 Furthermore it is contended that as a consequence of the restrictions imposed by Policy LP 8, the Richmond Local Plan is not consistent with the objectives of Policy 3.4 (and Table 3.2) of the London Plan (2016) which states <i>'development should optimise housing output for different types of location within the relevant density range shown in Table 3.2'</i>, nor the objectives of the Government's recent Housing White Paper <i>'Fixing our broken housing market'</i> (February 2017) which clearly expresses the Government's desire to deliver higher density development. The Housing White Paper (February 2017) states that the Government's objective will be secured through amendments to the National Planning Policy Framework.</p> <p>3.15 On this basis, it is concluded that Policy LP 8 of the Richmond Local Plan is not consistent with the National Planning Policy Framework, London Plan (2016), or emerging Government guidance, and cannot be found sound in its current form.</p>	<p>precluded in those areas, but would need to be considered on a site by site basis. The policy acknowledges that there may be site specific circumstances that could prevent the separation distances to be achieved; paragraph 4.8.8 recognises that a lesser distance may be acceptable in some circumstances. Such circumstances would then be considered on a site by site basis. No changes required.</p>
274	264	Vicky Phillips, South West London Environment Network	LP9 floodlighting and Para. 4.10.11	No			Yes	<p>SWLEN is a Twickenham based registered charity which works to support Friends of Parks and Civic Amenity groups in London Borough of Richmond and acts as the Chair and Secretariat of the Richmond Biodiversity Partnership which implements the Richmond Biodiversity Action Plan as referenced in the draft Local Plan.</p> <p>SWLEN is pleased to note the emphasis on the importance of and intention to protect the natural environment, parks and open spaces and biodiversity contained in the Strategic Context Vision and Objectives (Section 2) and Spatial Strategy (Section 3), for example the statements in 2.1.14, 3.1.2 and 3.1.15. It also broadly supports the policies put forward in Green Infrastructure (section 5). However it would like to make some suggestions which would improve the effectiveness of the Local Plan, including:</p>	<p>Inclusion of "Dark Corridors" - Relevant clauses of the plan should include a reference to "dark corridors" which are vital to nocturnal creatures such as bats, moths and owls, particularly when they are feeding in the hours after dusk. These are potentially disrupted by light spilling from adjacent developments, including floodlighting and security lighting. This should be cross-referenced with policy LP9 on floodlighting. 4.10.11 amend to read "detrimental impact on occupiers, residents and wildlife".</p>	<p>Comments noted, particularly the support for the protection of the environment, green infrastructure and biodiversity.</p> <p>In relation to 'dark corridors', the Local Plan and its Proposals Map do not include provision of a 'dark corridor' designation; there is no evidence base for designating 'dark corridors' and therefore it is considered inappropriate to include this within the Plan. It is acknowledged that the effects of lighting, amongst other things, can undermine the ecological value, but it should be noted that the Council's Local Plan and its policies need to be read as a whole. Therefore, in determining planning applications, any potential impacts on habitats and/or species such</p>

309	189	Shaun Lamplough, Mortlake with East Sheen Society	Policy LP11: Subterranean Developments and Basements Page 50, para 4.11.14							<p>MESS comments on Pre-Publication Local Plan, August 2016 - Add: "Evidence of engagement with neighbouring occupiers and evidence of no objection from them must be included as supporting information with the planning application".</p> <p>Council's response to MESS comments, January 2017 - Para 4.11.14 already deals with this matter. It should be noted that the Council cannot 'require' evidence of engagement; however, the existing supporting text states that 'Applicants wishing to undertake basement and subterranean developments are strongly advised to discuss their proposal with neighbours and other parties, who may be affected, by commencing Party Wall negotiations and discussing the scheme with the Council prior to the submission of a planning application.'</p> <p>MESS comments on Publication Local Plan, February 2017: Evidence of no objection comes from the Westminster City Plan and is proving to be effective. Consultations in Westminster have been known to result in applicants deciding not to proceed with their applications because of the disruption they would cause and the unpopularity they would incur in the community in the aftermath. MESS is pleased that there should be such consultation prior to an application being made because it could make applicants more aware of the views of their neighbours.</p>	Support welcomed. No changes required.	
258	186	Ann Hewitt, Mortlake Brewery Community Group	LP12 Green Infrastructure Pages 52-57 Paragraph numbers 5.1.1;5.2.1;5.2.3;5.2.4;5.2.5;5.2.6;5.2.7;5.2.10 Policies LP12, LP13, LP14 Site Allocation SA24							<p>Section 5 – Green Infrastructure</p> <p>The Local Plan is not sound. It has not been positively prepared, is inconsistent and omits information and back up guidance. Some information included in the Publication version was not available at pre-publication stage. The mix of local, London and National designations are not referred to consistently and/or information is omitted. The plan needs to include all designations with their status /significance explained to be consistent with national planning policies.</p> <p>Policy LP12 – Green Infrastructure B. Hierarchy of Open Spaces – taken from the London Plan but does not correlate with national/local designations which apply in the borough. In particular Local Green Space (LGS) and Other Open Land of Townscape Importance (OOLTI) have been omitted.</p> <p>5.1.1. Local Green Space omitted</p>	<p>Policy LP12 – Green Infrastructure</p> <p>The Local Plan would become sound if the following were adopted -</p> <p>B. Hierarchy of Open Spaces – Local Green Space and Other Open Land of Townscape Importance need to be included in this section to give the full picture of open spaces designations and possibilities in this borough.</p> <p>5.1.1. Local Green Space needs to be included.</p>	Comments noted. Policy LP 12 sets out the public open space hierarchy based on type and size, including a description of the main function. Other Open Land of Townscape Importance (OOLTI) and Local Green Space are open space designations that are not defined by size and type. However, certain criteria have to be met in order to be designated. This also applies to Green Belt and Metropolitan Open Land, which are also open land designations but not referred to within the public open space hierarchy. OOLTI or Local Green Space can either be public or private, as defined within the Local Plan, whereas the hierarchy under LP 12 is concerned with public open spaces. No changes required.

233	83	Rob Gray, Friends of the River Crane Environment (FORCE)	Section 5 Green Infrastructure Policy LP12	No						<p>FORCE would like to register the following concerns regarding the effectiveness of the Local Plan: Section 5. Green Infrastructure.</p> <p>FORCE broadly supports the proposals regarding Green Infrastructure.</p> <p>FORCE considers that one fundamental value of Green Infrastructure is its capacity for providing social and health benefits to the local population. In our view this benefit is not sufficiently referenced in the Plan - including cross references to other relevant parts of the Plan.</p> <p>In addition, in our view Friends Groups have a key role in delivering the protections and enhancements to the Green Infrastructure set out in the Plan. There are some 70 open space friends groups already operating in the borough and they provide a key interface between the open spaces, the council and the local community. The role of Friends Groups in delivering improvements, raising funds and engaging local communities is not referenced sufficiently in the plan and nor is there any policy support to underpin this role in the plan.</p> <p>These two key aspects are well understood at a national and regional policy level and are well demonstrated by ongoing activities at a local level. In our view these key aspects require Local Plan policy statements to support them.</p>	<p>5. Green Infrastructure</p> <p>Reference the value of green infrastructure in providing social and health benefits to the local communities. Commit the council to supporting social and health benefits through the provision of good quality green infrastructure and promoting activities in these spaces that help to deliver these benefits.</p> <p>Reference the importance of Friends groups to delivering good quality Green Infrastructure that supports and enhances the value of the local community. Commit the council to supporting the network of groups across the borough.</p>	<p>Comments noted. It is considered that the health and social benefits are adequately covered in the supporting text, in particular within paragraphs 5.1.4 and 5.1.8.</p> <p>The Council is mindful of the work of local groups in raising funds, delivering improvements and engaging local communities in the creation and maintenance of Green Infrastructure. However, these are not matters for the Local Plan and therefore no change is considered necessary.</p>
216	239	Dean Jordan, DP9 on behalf of Richmond Athletic Association	Green Infrastructure LP 12							<p>The supporting text to Policy LP 12 (Green Infrastructure) notes that Housing delivery and infrastructure is expected to be met without compromising the green infrastructure network and there is a presumption against the loss of, or building on, greenfield sites. Although the importance of greenfield sites within the Borough is understood by our client, the draft Local Plan should support complementary development on greenfield sites that are necessary to fund the improvement of existing or new sporting facilities to meet demand in the Borough.</p>		<p>Comments noted. No changes required as it would be inappropriate to refer to 'complementary' development or 'enabling' facilities within the main planning policy as any such additional, potential non-sporting facilities that would be contrary to green infrastructure, MOL and other policies, would need to be considered and assessed on a site by site basis as part of the development management process.</p>

275	264	Vicky Phillips, South West London Environment Network	Green Infrastructure Section 5		No			Yes	<p>New Richmond Nature Conservation Strategy - this strategy document is currently going through the process of agreement within Richmond Council and should be referenced in the Local Plan as it will be agreed by the time the plan comes into effect. It provides an important link between the Local Plan policies and the Richmond Biodiversity Action Plan.</p> <p>Friends and Civic Amenity Groups - we consider that there should be a reference to the fact that the Council positively encourages the role that these groups of local residents play in relation to Green Infrastructure and biodiversity, where they deliver improvements, raise funds and play a key role in communications between Richmond Council, others with an interest in open spaces and the local communities living around and using open spaces.</p> <p>Data sharing - data on biodiversity needs to be supplied to the Richmond Biodiversity Partnership as well as to GIGL.</p> <p>Site Allocations - we have comments on individual sites.</p>	<p>5.1.2 Add "dark corridors" after "woodlands"</p> <p>5.1.8 Include a statement of the importance that the Council attaches to the activities of Friends and Civic Amenity Groups at the end of this paragraph.</p> <p>5.1.10 After "allotments" add "green and dark corridors".</p>	<p>Comments noted. In relation to paragraph 5.1.2 and 5.1.10, the Local Plan and its Proposals Map do not include provision of a 'dark corridor' designation; there is no evidence base for designating 'dark corridors' and therefore it is considered inappropriate to include this within the Plan. It is acknowledged that the effects of lighting, amongst other things, can undermine the ecological value, but it should be noted that the Council's Local Plan and its policies need to be read as a whole. Therefore, in determining planning applications, any potential impacts on habitats and/or species such as bats, will be considered in accordance with the Council's planning policies, including policies on biodiversity, open land, river corridors and floodlighting. In relation to paragraph 5.1.8, the Council is mindful of the work of local Friends and Civic Amenity Groups do in raising funds, delivering improvements and engaging local communities in the creation and maintenance of Green Infrastructure. However, these are not matters for the Local Plan and therefore no change is proposed in this regard.</p>
348	113	Katharine Fletcher, Historic England	Policy: LP 12 Green Infrastructure Page: 52						<p>See Publication Local Plan Comment ID 340</p>	<p>As expressed above, it is important that Richmond's highly significant historic landscapes on Historic England's national Register of Parks and Gardens, and other landscapes of strategic heritage interest, are appropriately recognised in terms of the historic significance, and covered by policies in the local plan. There is a danger that these landscapes may be less prominent and fall between the two chapters addressing heritage assets and green infrastructure. Existing policy CP10 refers to these historic landscapes but new policy LP 12 omits the historic dimension of Richmond's exceptional landscape heritage. We would welcome the opportunity to discuss how this could be addressed in the plan here, and in chapter 4.</p>	<p>Comments noted. No changes required as the emphasis of Policy LP 12 is on the provision of green infrastructure standards and a network of open spaces within the borough. Paragraph 5.1.1 of the reasoned justification to the Policy specifically refers to the "highly significant historic landscapes, including those on the Historic England's national Register of Parks and Gardens, all of which make a significant contribution to the borough's green infrastructure network."</p>
382	70	James Togher, Environment Agency	Policy: LP 12 Green Infrastructure		Yes	Yes			<p>See also Publication Local Plan Comment ID 380</p> <p>We support this policy and the importance of river corridors as part of the green infrastructure network across the borough.</p>		<p>Support is welcomed. No changes required.</p>

51	102	Kalpana Hannapaneni	LP 13 Green Belt, Metropolitan Open Land and Local Green Space [LP 14 Other Open Land of Townscape Importance] Paragraphs 5.2 and 5.3 and there sub paragraphs Pages 54-58	No		Yes	Yes			<i>See comment ID 32 Publication Local Plan Proposals Map Changes</i>	<i>See comment ID 32 Publication Local Plan Proposals Map Changes.</i>	See Officer response to Comment ID 32 below.
52	137	Sri Lakshmi Katragunta	LP 13 Green Belt, Metropolitan Open Land and Local Green Space [LP 14 Other Open Land of Townscape Importance] Paragraphs 5.2 and 5.3 and there sub paragraphs Pages 54-58	No		Yes	Yes	Yes		<i>See comment ID 34 Publication Local Plan Proposals Map Changes.</i>	<i>See comment ID 34 Publication Local Plan Proposals Map Changes.</i>	See Officer response to Comment ID 34 below.

23	136	Mark Jopling	Policy LP 13 Green Belt, Metropolitan Open Land and Local Green Space 3,4 Maps 2.2.1 The designation of Udney Park Playing Fields as Local Green Space	Yes	Yes	Yes																																				Comments are noted and support for Policy LP 13 is welcomed.
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supply and demand that constitutes the Outdoor Space and Playing Pitch Policy, approved by Cabinet in June 2015. As Lord True said in December after the Local Plan was approved by Cabinet "My heart does not bleed for Quantum, they knew what they were buying, green space in a Borough which seeks to protect its green space". Regionally, the Mayor of London in July 2015 at Mayors Question Time stated that "I note that Lord Beaverbrook donated the Playing Fields for amateur sport, it would be an absolute outrage if Udney Park was lost for this purpose". The London Plan Chapter 7 specifically protects Playing Fields from development.

Nationally, the National Planning Policy Framework Paragraph 74 is very clear: "playing fields should not be built on". Even this week two separate policy statements from Westminster strengthen the protection of playing fields due their value to our societies health and well-being and wider benefits such as air quality and climate change:

UK Government Housing White Paper, published on 7th February 2017 gives clear direction to Local Authorities on the issue of Green Belt and Local Green Space on p21: "maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements"

The UK Government offered further clarification on the matter via the Public Parks White Paper, published on the 11th February 2017, by the Communities and Local Government Select Committee. It concludes in Para 135 that

"it is important that action is taken to safeguard and secure the future of England's parks and green spaces. Our witnesses describe parks as being at a tipping point, if the value of parks and their potential contribution are not recognised, then the consequences could be severe for some of the most important policy agendas facing our communities today

To conclude, the process of designation of Udney Park as LGS was managed appropriately by LBRUT and given all the policy commitments and statutory guidance it is entirely consistent and appropriate that Udney Park is a Local Green Space and protected from built development

36	208	Nicholas Grundy, Park Road Surgery Teddington	pages 54-58 Paras 5.2 and 5.3 and subparas Policy LP13 and LP14 Site Allocation: Udney Park Playing Fields	Yes	No	No	Yes	Yes	Yes	<p>(1) It was not positively prepared, as it did not adequately engage with local healthcare providers despite the plan acknowledging the need for improved primary care provision in the borough.</p> <p>(2) It is not justified because the decision to designate the Udney Park site as Local Green Space prevents adequate consideration of a development which would see the site better utilised for health and community use, albeit at the cost of some loss of green space.</p> <p>-LP1 states that “the public realm should be designed to be safe and accessible for all ages and levels of disabilities”. This is not the case for the existing NHS primary care estate in Teddington, based on survey data and the outcomes of practice Care Quality Commission reports.</p> <p>-LP27 “seeks to maintain local shops and services within walking distance of where people live”. Park Road Surgery will cap their list at 13,500 patients, at which point there is a risk of there being either no choice of GP surgery within walking distance of local residents (if Thameside Medical Practice remains open, where they would continue to be the only option), or no GP surgery at all (if Thameside Medical Practice merges or closes, where there would be no surgery in Teddington at which new patients could register).</p> <p>-LP29, which “seeks to secure local job and training opportunities”; CP 16 Local business; and DM EM 2 Retention of Employment; although the practice train junior doctors and medical students, currently 2 of the 3 GP trainers are unable to train each year. Similarly, although the practice has occasional nursing and family planning trainees on-site, these opportunities are limited in the current building. Finally, the practice takes apprentices on from Kingston Adult Education college, and again these options are limited by, and at risk in, their existing building. The proposed change would protect town centre land for local employment, allaying the loss of employment to Permitted Development Rights.</p> <p>-These proposed enhanced employment opportunities are in keeping with national healthcare guidance - NHS England, £10 million investment boost to expand general practice workforce (http://www.england.nhs.uk/2015/01/26/boost-gp-workforce/), Health Education England, District Nursing and General Practice Nursing Service – education and career framework (http://www.hee.nhs.uk/sites/default/files/documents/District%20nursing%20and%20GP%20practice%20nursing%20framework_0.pdf); the Queen's Nursing Institute, General Practice Nursing in the 21st Century: a time of opportunity. 2015</p>	<p>We are responding to the draft Local Plan as a GP surgery in the Teddington Ward of the Borough, which serves just over 13,100 patients, that being approximately 6.7% of the population of the Borough.</p> <p>We are submitting a representation outlining the surgery's views, and giving an indication of our patients' support for these with the consent of 709 of our patients who responded to a survey and authorised us to use their names in this way. Our Patient Participation Group are making a separate, independent representation in their role as representatives of our whole patient population.</p> <p>Necessary changes</p> <p>The practice supports the proposal put forward by Quantum in relation to the Udney Park site on the basis that it addresses the practice's premises needs as identified in the Local Plan, and meets the communities healthcare needs as similarly identified. The proposed use maintains the majority of the green space on the site, would increase community access to it, and the nursing home and elderly care living components of the proposal have synergies with the practice's healthcare services on the site.</p> <p>We understand, and are sympathetic to, the need to protect green space. However, where the local plan recognises the inadequacy of existing healthcare provision and outlines the anticipated increases in demand over the coming years, the Quantum proposal should be considered appropriately and thoroughly rather than blocked without consideration to the process and to public consultation. We therefore oppose the redesignation of the site as Local Green Space, for reasons which were best summed up by one of the responses from a patient to our survey:</p> <p>“I am very happy to support the proposal to move the Park Road Surgery to the Udney Park Playing Field site and you may certainly use my name. I understand all the concerns about the development of the site and share them. However, if it is going to happen I think what is proposed is a good compromise and will add to the Community in a way that serves the needs of every age group and still retains a proportion of that much valued green space.”</p> <p>Of the 709 respondents to the practice premises survey, 65% were supportive of the practice relocating to the site, and we suggest this is representative of the feeling in our 13,100 patient population.</p>	<p>Comments noted. No changes required. See Officer response to Comment ID 9 above and Comment ID 324 below. Also see the Officer response in the separate Proposal Map Changes document in relation to Comment ID 4.</p> <p>In relation to the comments on the GP surgery, it should be noted that the Council is working closely with the Richmond Clinical Commissioning Group to address this issue and consider all available options.</p>
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(<http://www.qni.org.uk/docs/GPN%2021%20Century%20Report%20FOR%20WEB.pdf>).

-The Infrastructure Delivery Plan, p.30: "These are challenging times for the health sector to maintain existing facilities and increase flexibility and choice to patients. Proposed new development will create an increased demand for health services that may not have been anticipated, which in places could create the need for additional capacity." This, similarly, cannot be met unless all appropriate sites are given due consideration.

(3) It is not effective because the redesignation of Udney Park playing fields as Local Green Space runs the risk of putting the entire site out of community use as it is privately-owned, and as such the Local Plan's aims on the site are not achievable given the current ownership of the site and the existence of a proposal with community backing. As such, we do not believe that the Local Plan is deliverable in Teddington with the restrictions on the site. There is already a significant lack of primary care healthcare space in Teddington, with the two surgeries located in the ward collectively having 574m² against a recommended size of 1370m², meaning they have 41.9% of the space NHS best practice guidance would suggest they should. This is significantly worse than the Borough average for GP surgeries of 63.0% of recommended space, and Park Road Surgery in particular are the second-most undersized practice despite having the second-largest list in the Borough.

One of the two GP surgeries in Teddington, Thameside Medical Practice, is currently looking to merge with another local practice, and this would mean the loss of their site to healthcare, leaving the ward even more critically short of space. If Thameside Medical Practice were to close, this would leave Teddington without a GP surgery compliant with the Disability Discrimination Act, and this would breach the Council's Equalities Impact Assessment, particularly section 3.8, which aims to make borough centres "more accessible to disabled people", and acknowledges "a need for further improvements both to the public realm and access to individual shops and services".

The current, and projected increases, in the needs of the borough's population are established in the Health Impact Assessment:

(1) the high proportion of people aged 65+ in the borough (Section 7.7: 13.5% vs. London average 11%), and that this "is likely to lead to an increase in demand on services"

(2) the high proportion of older people living alone (Section 7.9: 16% vs. London average 9%), and "increasing numbers of older people living at home with multiple long term conditions"

(3) the resulting need for “more services[...]closer to home” (Section 7.24), and the whole section under the heading “Pressure on health infrastructure”

(4) “Richmond CCG's priority is for provision of more health services based in the community” (7.24), and there is a need in the Teddington Ward for increased community space to accommodate these.

While these needs are recognised in the local plan, the current form of the plan prevents these needs being met on the Udney Park site, and prevents proper consideration of Quantum’s proposal by the local community.

Why the plan fails the duty to co-operate

(1) Given that the council was aware of the increasing local healthcare need, and the involvement of the Park Road Surgery in Quantum’s proposal, we suggest the decision to designate the site as Local Green Space should have been explicitly discussed with Richmond CCG in keeping with The council's duty to co-operate per para 1.2: “the provision of health, security, community and cultural infrastructure and other local facilities”, and para 2.3 “the provision of social infrastructure and other local facilities”.

(2) Similarly, the council have a duty to co-operate with (para 2) “the borough and its interrelationship with Greater London and the South East”. The Londonwide Better Health For London report (<http://www.londonhealthcommission.org.uk/our-work/publications/>) notes: “All of us should be ashamed at the state of many of London’s GP practices: the condition of most practices is ‘poor’ or ‘acceptable’, and a staggering three-quarters of London’s GP practices are in need of rebuild or repair.”

(3) Similarly, the council's engagement with Prescribed Duty to Co-operate bodies, specifically Richmond CCG and NHS England, as set out in the duty to co-operate document in Appendix 7, notes: “the borough’s social infrastructure is at capacity and with population growth it is very important that sufficient land is secured for required social infrastructure uses, such as health facilities and children’s nurseries, to support the growth and development in the borough”. As such, we regard the unilateral decision to redesignate the Udney Park site, without reference to Richmond CCG, as a failure of the duty to co-operate.

Although many of these needs are recognised in the local plan, its current form prevents the council from acting to meet those needs.

205	118	James Stevens, Home Builders Federation Ltd	Policy LP13: Green Belt, Metropolitan Open Land, and Local Green Space	No						<p><u>We consider that the policy is unsound because it is unjustified owing to the size of the unmet housing need.</u></p> <p>We consider that there are exceptional circumstances – the unmet need of 7,320 homes and London’s strategic unmet need of 7,000dpa – that justifies a review of green belt land to release some of this to accommodate a larger proportion of the unmet need. We also consider that attaching ‘significant weight’ to local green space, although this is a footnote 9 designation, needs to be reviewed given the unmet need.</p> <p>The Council has not demonstrated that it has explored the capacity of the Borough through an up-to-date SHLAA and whether it might be feasible to release land from either the green belt, green field, or local green spaces.</p>	<p>Comments noted. The Council considers that the Plan meets the tests of soundness and that it is consistent with national policy and guidance. The Borough has been able to meet and exceed the London Plan target as prescribed in the London Plan 2016. Therefore, there is no conflict with the NPPF as paragraph 14 makes clear that needs should not be met if: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted. It should also be noted that the Mayor of London does not support any release of land designated as MOL or Green Belt. No changes required.</p> <p>Also see the Officer response to Comment ID 210 below.</p>
280	264	Vicky Phillips, South West London Environment Network	LP 13, section 5.2, Green Belts and MOL.	No			Yes			<p>Cemeteries - whilst we understand the categorisation of existing, longstanding cemeteries as an appropriate use for Green Belt or MOL we do not agree that the creation of new cemeteries is appropriate unless they are green burial sites managed for wildlife without extensive areas of hard landscaping, paths and buildings.</p>	<p>LP13A - remove the words "and cemeteries" and insert "and green burial sites managed for wildlife".</p> <p>Comments noted. It is considered that Policy LP 13 (Green Belt, Metropolitan Open Land and Local Green Space) is consistent with the National Planning Policy Framework, Planning Practice Guidance as well as the London Plan. No changes required.</p>
250	219	Craig Hatton, Persimmon Homes - Thames Valley	Policy LP13 Green Belt, Metropolitan Open Land, and Local Green Space	No			Yes			<p>We consider that the policy is unsound because it is unjustified owing to the size of the unmet housing need.</p>	<p>We consider that there are exceptional circumstances in lieu of the significant unmet need for Richmond which justifies a review of green belt land to release some of this to accommodate a larger proportion of the unmet need. A Green Belt review should be carried out as part of the Local Plan process.</p> <p>Comments noted. The Council considers that the Plan meets the tests of soundness and that it is consistent with national policy and guidance. The Borough has been able to meet and exceed the London Plan target as prescribed in the London Plan 2016. Therefore, there is no conflict with the NPPF as paragraph 14 makes clear that needs should not be met if: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted. No changes required.</p>

283	206	Richard Boother , RPS on behalf of Mr S Oxley	Policy LP 13 Green Belt, Metropolitan Open Land and Local Green Space MOL objection to Para. 5.2.4 and Remove 32 Clare Lawn Avenue from MOL designation.	Yes	No	Yes	Yes	Yes		Yes	RPS has been instructed by Mr. S. Oxley to object to the continuing designation of land at 32 Clare Lawn Avenue as Metropolitan Open Land (MOL). See Proposals Map Changes Comment ID 83	See Proposals Map Changes Comment ID 83	See Officer response in separate Proposals Map Changes document under Comment ID 83.
217	239	Dean Jordan, DP9 on behalf of Richmond Athletic Association	Green Belt, Metropolitan Open Land and Local Green Space LP 13								Our client supports the wording of Policy LP 13 which recognises that there may be exceptional cases where inappropriate development may be acceptable on Green Belt, Metropolitan Open Land and Local Green Spaces provided that it meets the listed set of criteria. However, for consistency within the document we request that the policy criteria are amended to include “ <i>or complementary development which is necessary to support the costs of improving/replacing existing facilities</i> ”.		Comments noted. No changes required as it would be inappropriate to refer to 'complementary' development or 'enabling' facilities within the main planning policy as any such additional, potential non-sporting facilities that would be contrary to green infrastructure, MOL and other policies, would need to be considered and assessed on a site by site basis as part of the development management processes.
259	186	Ann Hewitt, Mortlake Brewery Community Group	LP 13 Green Belt, MOL and Local Green Space Submission for Local Green Space at SA 24 Stag Brewery, Mortlake Pages 52-57 Paragraph numbers 5.1.1;5.2.1;5.2.3;5.2.4;5.2.5;5.2.6;5.2.7;5.2.10 Policies LP12, LP13, LP14 Site Allocation SA24	No	No		Yes			Yes	Policy LP13 – Green Belt, Metropolitan Open Land and Local Green Space Local Green Space (LGS) appears for the first time in this final version of the Local Plan so we have not had the opportunity to comment on it or make an application. The current references fail to recognise its proper status as equivalent to Green Belt - e.g. paras 76-78 in NPPF are not fully explained/given weight. No information or guidelines are available to residents on how to apply for an LGS nor any explanation provided of how it compares to OOLTI designation. Local Green Space is an essential designation for safeguarding precious green spaces in the borough – particularly those which currently have an OOLTI listing which appears to be have been downgraded in this plan (see below - LP14). 5.2.10. Criteria for Local Green Space are inaccurate – there is no mention of land allocated for development as one of the criteria in the NPPF (para 77).	Policy LP13 – Green Belt, Metropolitan Open Land and Local Green Space As Local Green Space (LGS) appears for the first time in this version of the Local Plan full references should be included to recognise its status with particular reference to paras 76-78 in the NPPF. Relevant, information, guidance and guidelines need to be made available to residents on how to apply for an LGS. An explanation of how it relates to the Other Land of Townscape Importance designation needs to be included in the final version of the Plan. Local Green Space should be included in A, B and C as it holds the same status as Green Belt. All references to Green Belt should also include references to Local Green Space e.g. – paras 5.2.1; 5.2.3; 5.2.4; 5.2.5; 5.2.6; 5.2.7 5.2.10. Criteria for Local Green Space - remove bullet point “the site is not land allocated for development within the Local Plan” as this is not consistent with NPPF criteria (para 77). We are submitting an application to make the Sports Field on the Lower Richmond Road, Mortlake with this representation (see below) based on the information available to us. Submission to upgrade the Sports Field, Lower Richmond Road, Mortlake from an OOLTI to a Local Green Space Designation on behalf of Mortlake Brewery Community Group and Mortlake residents	The application of the Mortlake Brewery Community Group’ and Mortlake residents’ submission for designation of the sports field at Lower Richmond Road, Mortlake as Local Green Space has been considered and assessed against the Policy LP 13 criteria (in paragraph 5.2.10 of the Local Plan) and the NPPF. The following sets out a detailed assessment of each criterion: • The site is submitted by the local community - this criterion is considered to be partially met as the application has been submitted on behalf of the Mortlake Brewery Community Group. However, it is not clear as to the extent of how the application represents the views of the “Mortlake residents”, including how these views have been gathered, and whether this refers to a particular community group or the wider residents as a whole. • There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation - this criterion is considered to be met as it is the case that there is no current planning permission for development on this site.

We believe the Local Green Space designation would provide protection additional to any existing protection policies, and its special characteristics cannot be protected through any other more adequate means - We are concerned that this much valued and rare open and green space in Mortlake is under threat from future development which is likely to take place before any future Local Plan is considered. We believe that it is not adequately protected currently because -

- In the final Publication version of the Local Plan under SA24 the word “reprovision” has suddenly appeared in regard to the Sports Field rendering it more vulnerable as an open space and making the need to safeguard and upgrade its designation urgent.
- OOLTI designation is no longer adequate as it has been downgraded in the final version of the Local Plan by the inclusion of “where possible” in LP14. Neither does this designation feature in either the London Plan nor NPPF policies.
- As mentioned in the representation above this is the first opportunity which has occurred to apply within the Local Plan process as no information or guidance was available from the Council at previous stages of preparation.
- Any development of this green space would be harmful and inappropriate. Much of Mortlake already appears as an area of deprivation of green space on the Pockets Park map for the borough. This includes the area surrounding the Sports Field.
- The London Plan states “Loss of protected open spaces must be resisted” (Policy 7.18 B).

It also fulfils the following criteria - There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation - We do not believe that the criteria asking if the land is allocated for development with the Local Plan is consistent with criteria set out in the national policy (see representation above).

However, The Stag Brewery Site has been allocated for development. The Sports Field which sits on the edge of this site currently has OOLTI status/protection. The Final Publication Version of the Local Plan has been amended to allow for this space to be ‘reprovisioned’. However the Planning Brief for the site agreed in 2011 states: ‘Consideration has been given to whether there would be any benefits from the relocation of this space and the Council’s conclusion (supported by the public) is that it must be retained in this location, and made more accessible for public use.’

- The site is local in character and is not an extensive tract of land. The site is 2.1 hectares and its boundaries are fenced or walled. It is rectangular, not far off from square, so a versatile and adaptable shape. The site sits in the heart of

The playing field is designated Other Open Land of Townscape Importance (OOLTI), and the associated OOLTI policy states that these areas will be protected in open use, and enhanced where possible. In this context, it should be noted that the OOLTI policy has not been downgraded – also see Officer response to Comment ID 260. It is noted that the landowner has carried out pre-application consultations with the local community.

- The site is not land allocated for development within the Local Plan - this criterion is not met as the Local Plan allocates the site as part of SA 24 for wider comprehensive development. It is therefore considered that this proposed Local Green Space designation is not consistent with the National Planning Practice Guidance as it is used in a way that undermines the aims of this Plan, particularly in relation to achieving site allocation policy SA 24 Stag Brewery.
- The site is local in character and is not an extensive tract of land (this corresponds with the third bullet point of the NPPF criteria) - this criterion is considered to be met as the sport fields are existing playing fields within an urban setting. The site is 2.1 hectares and its boundaries are fenced or walled and formed by Williams Lane on two sides with a mixture of new housing and former brewery employee’s dwellings, by the old brewery on the third side and the Lower Richmond Road on the fourth.
- Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves (the latter part of this criterion corresponds with the first bullet point of the NPPF criteria) - the playing field is situated in the heart of Mortlake abutting the Lower Richmond Road, easily accessed on foot or public transport by the community. It is currently accessible to local sports clubs and schools with the owner’s permission.

the local community of Mortlake. Its boundaries are formed by Williams Lane on two sides with a mixture of new housing and former brewery employees dwellings, by the old brewery on the third side and the Lower Richmond Road on the fourth.

- The site is publicly accessible and is within walking distance of the community. The site sits in the heart of the local community abutting the Lower Richmond Road. Currently it is accessible to local sports clubs and schools with the owners' permission with the majority of users arriving on foot. Those attending the annual Mortlake Fair arrive on foot, as they live locally.

- This Local Green Space is demonstrably special to our local community and holds particular local significance especially:
Recreational value

- It is currently used regularly by several junior football teams on Saturdays and Sundays. It is also used occasionally by other local groups and schools. It hosts the annual Mortlake Fair in June, an event which is attended by several hundred residents, is organised by the PTA of one of the local primary schools and affords a rare opportunity and venue to bring a diverse range of residents together.

- This field is at the heart of the community. Until recent times the adjacent brewery was at the core of Mortlake employing many of the local residents and playing a significant part in the community. The field was used for sports by the employees and their families and several local football teams. Many residents continue to see it as their place.

- Any new development on the brewery site will create a greater need for use by the general public, reflecting the need for space for sports and exercise that is so important for people in one of the most densely populated areas in the borough.

Historic significance

The open space that is now known as the Mortlake playing field was a part of the parish lands or commonfields in early Medieval times. Village tenants would have been allocated strips in the field to farm. They held strips in different areas so that they all had a share in the good and poor land which would have been under crop and ploughed. However, the modern playing field was called Clay Ends which suggests that it was not ideal farming land.

In 1634 John Blackwell, who lived in Cromwell House, bought this land from the parish and enclosed it for his own use. He paid 20 marks for this. He also stipulated that the money be used by the Vestry to build a school for the village children. The school was originally attached to St Mary's parish church and later became the National Schools which closed in 1982. Blackwell and subsequent owners of Cromwell House used the field as meadow land or for grazing.

Therefore, this criterion is considered to be met.

- The Local Green Space is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife (this corresponds with the second bullet point of the NPPF criteria) - it is understood that the playing field has a rich and varied history and is the only remaining commonfield in Mortlake that has never been built on. However, it is of concern that the main reason for the proposed Local Green Space designation appears to be to ensure that the playing field does not get built on as set out in Policy SA 24 of the Local Plan.

- The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means - the playing field is designated OOLTI and the associated OOLTI policy states that these areas will be protected in open use, and enhanced where possible. It is acknowledged that the OOLTI policy is a local policy concerned with the protection of open spaces that contribute to the importance of townscape and local character. The OOLTI Policy LP 14 requires the protection of land designated as OOLTI in open use, and the policy only allows for minor extensions or replacement facilities provided that it would not harm the character or openness of the open land. Therefore, this policy is considered to be a strong and robust policy. The OOLTI policy recognises however that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, such as the Stag Brewery redevelopment, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an

											<p>Watney's bought Cromwell Meadows in 1919 and made them suitable for athletics and football. They were used for allotments in WW2 and then in 1966 the English football team used the field for practice sessions in preparation for the World Cup as it was said that the ground and grass closely resembled that of Wembley Stadium.</p> <p>The playing field has a rich and varied history and is the only remaining commonfield in Mortlake that has never been built on.</p> <p>Beauty, tranquillity and wildlife</p> <ul style="list-style-type: none"> - The Sports Field is surrounded by lines of trees on two sides – they are all protected by TPOs. The Horse chestnut and Hawthorn avenue along the Lower Richmond Road edge is much loved by all and is particularly beautiful when the trees are in blossom. The birds also appreciate the autumn berries from the Hawthorns. - We are reliably informed by an expert that the avenues of trees provide both foraging and roosting opportunities for local bats, as part of their “round” of trees from the river to Mortlake Green. - The field provides an informal green space and oasis for local residents in a densely built up part of the borough. It is particularly valued by residents whose homes overlook the space. - It is a space of paramount importance to counteract the effects of the high levels of pollution from car emissions on the traffic-filled adjoining Lower Richmond Road and nearby A316, as noted in the Local Plan. 	<p>improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances (however, re-provision would have to be on site and not elsewhere in the Mortlake area). It is therefore acknowledged that the designation would provide some additional protection at a level that is similar to Green Belt and/or Metropolitan Open Land; however, this is contrary to the aims of policy SA 24 and could undermine the delivery of the Local Plan's Spatial Strategy, vision and objectives.</p> <p>Based on the above, it can be concluded that the application for a Local Green Space designation does not meet all of the criteria as set out in the Publication Local Plan policy. In particular, it is of concern that the proposed designation is contrary to the aims of policy SA 24 as set out within the Local Plan; in this instance, the OOLTI designation is considered to be sufficient.</p>
300	202	Peter Willan, Old Deer Park Working Group	Policy: LP 13 Green Belt, Metropolitan Open Land and Local Green Space THE WORDING OF POLICIES LP 6, LP 13 AND 14 (REFERENCES 118, 159, 168)	No						<p>The Group notes with considerable regret the continuing resistance of the Council to amend the wording under Policies LP 6, 13 and 14 as urged by the Group in its formal submission of August, 2016. The Group does not accept the reasons stated by the Council for rejecting such amendments and believes that the present wording remains unsound.</p>	<p>Comments noted. No changes required as the Council considers it too onerous to require development proposals to contribute to preserving and/or enhancing the Green Belt/MOL. This criterion is not in line with the NPPF policy on Green Belt and has never been part of the MOL policy in the Local and London Plan; usually this is applied to developments in Conservation Areas only. Adding this additional criterion would therefore be seen as not being in line with London Plan and NPPF policy and guidance.</p>	
331	274	Judith Livesey, Nathaniel Lichfield & Partners	Policy: LP 13 Green Belt, Metropolitan Open Land and Local Green Space Pages: 54-56 Paragraphs: 5.2.1 to 5.2.7	No		Yes	Yes		Yes	<p>See Appendix (23) to this document for the Appendices referred to</p> <p>Introduction St Paul's School (SPS or 'the School') considers that the Local Plan and its associated Proposals Map Alterations are unsound in relation to Metropolitan Open Land (MOL) policy and MOL boundaries because:</p> <p>1 The MOL boundary at the School has not been reviewed as part of the Local Plan process. The boundary is out of</p>	<p>Amendments to Policy LP 13</p> <p>Policy LP 13 as currently worded incorrectly implies that developments outside of MOL have an impact on openness. This is not the case; developments beyond the MOL may have a visual impact but do not have an effect on the openness of the MOL. The policy wording should be amended to remove the following sentence: "When considering development on sites outside Green Belt or</p>	<p>Comments noted. No changes required as it is considered that development outside of MOL could in some instances impact upon the openness of MOL, for example, if a large or overbearing, overpowering or over-dominant development is proposed adjacent to MOL.</p>

	<p>behalf of St Paul's School</p>	<p>See also: Local Plan Proposals Map Changes Page: 3 Other: Omission of amendment to Metropolitan Open Land boundary at St Paul's School to remove areas of developed land to the west of St Paul's School that does not fulfill MOL functions.</p>							<p>date; being established over 30 years ago and has remained largely unchanged since. A review of land subject to MOL was last undertaken on behalf of the Council 11 years ago and did not examine whether areas of existing MOL should be de-designated. Paragraph 5.5.2 of the Local Plan states that "MOL, as shown on the Proposals Map, plays an important strategic role as part of the borough's and London-wide multi-functional green infrastructure network", however, land within the MOL boundary to the south and west of the main School buildings does not does not fulfil this strategic role; this has been confirmed by GLA. The Council's position is not justified by an up-to-date, robust or credible evidence base.</p> <p>2 National planning policy directs (by virtue of Green Belt policy) that the alteration of the boundary can only be undertaken as part of the Local Plan process (NPPF paragraph 83). In the case of SPS, we consider that exceptional circumstances exist that justify removal of some limited areas that do not meet the criteria for MOL designation (London Plan Policy 7.17). Amending the boundary would enable a clear and permanent boundary to be defined which is compatible with national policy (NPPF paragraphs 83 and 85).</p> <p>3 The lack of a review at the SPS site is inconsistent with NPPF paragraph 72 which requires LPAs to take a proactive and positive approach and give 'great weight' to the need to expand or alter schools. It would be unreasonable for the Council to hamper the School with out of date and unjustified MOL boundaries for a further 15 years. In the context of NPPF paragraph 72, the lack of boundary amendments at the School means that the Local Plan has not been positively prepared.</p> <p>4 Local Plan Policy LP13 incorrectly implies that the openness of MOL is impacted by development that is not within MOL. This is not consistent with national policy (which does not refer to the effect of development beyond MOL). Nor is it compatible with the interpretation of Green Belt policy as confirmed through the courts. Further justification/ reasoning that supports these points is provided below.</p> <p>Lack of MOL Boundary Review Paragraph 83 of the NPPF states that once Green Belt (and by extension MOL) boundaries have been established, they should only be altered in exceptional circumstances, through the review of the Local Plan. Policy 7.17 of the London Plan states that "any alterations to the boundary of MOL should be undertaken by Boroughs through the Local Development Framework process, in consultation with the Mayor and adjoining authorities." A review of the MOL boundary is sought as part of the Local Plan process</p>	<p>Metropolitan Open Land, any possible visual impacts on the character and openness of the Green Belt or Metropolitan Open Land will be taken into account." This change would remove the schools objection on this point. <i>See also Proposals Map Changes Comment ID 87.</i></p>	<p>Also see the Officer response in the separate Proposals Map Changes document Comment ID 87.</p>
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as exceptional circumstances exist to justify removal of some limited areas from the MOL.

We consider that exceptional circumstances exist at the SPS site and that the boundary at the site should be reviewed as part of the current Local Plan Review.

The School occupies 18 ha of grounds immediately west of the Hammersmith Bridge. Existing MOL boundaries are identified on the Council's Proposals Map (July 2015); 14.7 ha of the School grounds comprise land designated as MOL, including both the east and west playing fields. The boundary is tightly drawn to exclude the main cluster of 1960's School buildings on the site. However, there are a number of buildings and other development within the MOL.

The MOL boundary was established at a local level over 30 years ago in the 1985 Richmond Local Plan and it has remained largely unchanged at the School; a single minor amendment was made 20 years ago as part of the October 1996 Unitary Development Plan. The most recent review of MOL boundaries was undertaken on behalf of the Council was published in January 2006 (11 years ago). The Review did not systematically examine whether areas of existing MOL should be de-designated if they no longer function in accordance with the criteria for such a designation. The situation has not therefore been reviewed through the Local Plan process for over 20 years. In addition, the boundary as drafted in 1996 includes buildings used for teaching and accommodation as well as areas of car parking. A plan of the existing MOL boundary at the School is appended to this response form (Appendix 1).

Recognition that some of the land at SPS did not fulfil the criteria review was given by the GLA when consulted on a hybrid application for the redevelopment of the School (ref: 08/1760/OUT). In planning report ref: PDU/1291a/01(attached at Appendix 2) the GLA agreed that particular areas of MOL at the School did not fulfil the function of MOL and that a case could be made for them to be de-designated; paragraph 23 states "The current uses of this land include a range of tarmac car parks, access roads and existing buildings. As such, these areas are not distinguishable from the built-up area, are not of a nature conservation or habitat value, and it could therefore be argued that the areas of land do not fulfil the function of MOL land... A case could be made for these areas to be de-designated as MOL through the Local Development Framework process. This approach is supported by London Plan policy and national guidance."

The School has since implemented significant redevelopment works following the grant of the hybrid planning permission in January 2009. The permission

allows a total of 2,385 sqm footprint of 'inappropriate' development and 1,500 sqm footprint of 'appropriate' development in MOL. A new access road has been built to the west of the school, within the MOL and provides a clear delineation of the western edge of the built parts of the School. A plan of the development approved in MOL under the hybrid permission is appended to this response form (Appendix 3) (N.B. the layout of the proposed buildings was provided on an indicative basis only).

The School acknowledges the principle of protecting open space that makes a valuable contribution to the Borough, including MOL land on the School's east and west playing fields. However, there is a conflict between the current boundary at SPS and the criteria for MOL designation, the development granted planning permission that has been implemented and development granted planning permission that will be implemented over the earlier term of the Local Plan 2018-2033. Reviewing the boundary as part of the current Local Plan will ensure that the delivery of required educational facilities is not unduly fettered or complicated by historic boundaries that are out of date. Within its responses to the comments received on the Pre-Publication Local Plan; the Council has confirmed it is not reviewing MOL boundaries as part of the Local Plan (including at SPS) as "...the Borough can meet its housing needs without releasing open land that is protected by designations such as Green Belt or MOL". We consider that this should not preclude the review of the MOL in relation to the provision of infrastructure, including schools, or on a case by case basis where justified by the circumstances. NPPF paragraph 72 implies that a positive approach should be taken to development at schools. We note that such a positive approach has been taken at the Harrodian School where the Publication Version Proposals Map Changes, identifies an area of land for removal from the MOL as it was "...recognised and acknowledged that the cluster of buildings in the south-western corner of the site can be clearly distinguished from the predominately open character of the remainder of the site." The Council is being inconsistent in its approach to dealing with the potential amendments of the MOL boundary by not giving due consideration to other potential releases.

The School has commissioned its own review and this demonstrates that exceptional circumstances exist to remove a number of areas to the south and west side of the main School buildings. Taking into account the GLA's views on the hybrid permission, it is clear that these areas do not meet the criteria for MOL and/or will be developed during the next the Local Plan period. Further detail of the review is provided below.

Three main areas of land to the south and west of the main School buildings have been identified as not meeting the criteria for designation of MOL set out in London Plan policy 7.17:

1 Car park and other land to the east of the School drive at the entrance to the site that has detailed planning permission for staff residential development with a total footprint of 695 sqm in the MOL.

2 The area around the Centenary Building to the east of the main School access and west of the main School buildings. This area has outline planning permission for new building footprint of up to 1,030 sqm within the MOL.

3 The area around the Thames Water Compound and 'bowl' car park which includes Parcel 7 of the approved parameter plans which has outline permission for new building footprint of up to 650 sqm within the MOL and the existing buildings: East House, Junior Music School and West House. This area is predominantly hard landscaped or occupied by buildings.

In drawing these boundaries, consideration has been given to paragraph 85 of the NPPF which states that local planning authorities should: "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."

London Plan (Policy 7.17) confirms that to be designated as MOL land should: a contribute to the physical structure of London by being clearly distinguishable from the built up area; b include open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London; c contain features of landscape (historic, recreational, biodiversity) of either national or metropolitan value; d form part of a Green Chain or a link in the network of green infrastructure and meet one of the above criteria.

The performance of the three key areas identified in relation to the criteria above and their visual relationship to the MOL are considered in turn below.

Area 1: the car park to the east of the School entrance and driveway: 1 The site does not meet any of the criteria for MOL and does not function as MOL. It has an essentially urban character relating more to the residential area to the east. It is not clearly distinguishable from the built up area. It does not serve a strategic recreational purpose or contain a feature or landscape of national or metropolitan importance. It does not have a green open character and is currently largely developed and used as a car park. The site has planning permission and will be developed to provide staff residential units within the Local Plan Review period. 2 The site is visually discrete from the area of playing fields that are designated as MOL owing to the double line of mature trees, the wall along the driveway

and the high concrete slab wall on the Lonsdale Road frontage. It is not viewed as an open space from public vantage points. 3 Within the planning report ref: PDU/1291a/01, the GLA agreed that the car park to the north east of the School entrance does not fulfil the function of MOL land as “the land is screened by an avenue of trees which act as an existing border to the open playing fields to the west, and the residential streets to the east” (paragraph 23). In addition: “The land is currently a tarmac car park, is separated from open MOL by the school access road and screened by an avenue of trees, and is adjacent to existing residential units. Therefore it can be argued that this land is urban and not open in character and does not fulfil the function of MOL” (paragraph 29). It is considered that there is a clear justification for the removal of this area of land from MOL and that view was shared by GLA officers.

Area 2: the land between the main School buildings and the driveway and turning head: 1 The land does not meet any of the criteria for MOL and does not function as MOL. It predominantly comprises hardstanding and existing buildings and is located adjacent to existing developed areas. It is not clearly distinguishable from the built up area. It does not serve a strategic recreational purpose or contain a feature or landscape of national or metropolitan importance and it does not have a green open character. 2 The land has planning permission for the development of school buildings that are anticipated to be built within the Local Plan Review period. 3 The land is not prominent from existing vantage points as a result of screening by intervening trees, buildings and other structures. Development in this area would have a limited effect on views from Lonsdale Road. The visual effects will be limited by the distance over which the views are obtained, the screening provided by intervening buildings (Centenary Building/Pavilion) and the reservoir, the trees within the MOL and the backdrop of taller buildings beyond. There are limited views of the site from the tow path to the north due to the existing buildings. 4 Within the report ref: PDU/1291/01 (which considered development proposals under application ref: 07/1760/OUT; proposals in respect of land to the west of the main School buildings remain the same as the approved hybrid scheme), the GLA considered that “The majority of this land is on the edge of the existing school building envelope, which is not designated as MOL. The proposed development is therefore located immediately adjacent to existing development. In this respect the proposal will not impact the significantly on the current openness of the site” (paragraph 21). It is considered that there is a clear justification for the removal of this area of

land from MOL.

Area 3: the Thames Water Compound, 'bowl' car park and West House: 1 The land does not meet any of the criteria for MOL and does not function as MOL. It contains a large amount of hardstanding and existing buildings and is not clearly distinguishable from the built up area. It does not serve a strategic recreational purpose or contain a feature or landscape of national or metropolitan importance and it does not have a green open character. There is planning permission for development in this area including on Parcel 7. As noted above the GLA considered that land on the edge of existing school buildings did not contribute significantly to the open character of the site and this remains the case. 2 From the tow path, views are limited by intervening bunding, trees and buildings. The bowl car park is sunken and is not visually prominent from Lonsdale Road as it is seen across the School's western playing field which is elevated due to the underground reservoir. The existing buildings are visible from the towpath and seen in conjunction with the main group of buildings on the site and perceived as part of the developed area. We consider that there is a clear justification for the removal of this area of land from MOL. In summary, the Publication Local Plan and the omission of an amendment to the MOL boundary at St Pauls School on within the Publication Version Proposals Map Changes is not adequately justified on a credible evidence base. The MOL boundaries are now significantly out of date and have not been reviewed for 20 years. Undertaking such a review would allow the School, to meet its operational needs without being unduly hampered by an unwarranted policy designation that does not serve its intended purpose. The Publication Local Plan has not been positively prepared in relation to the School, failing to adequately consider the benefits of updating the MOL boundaries in the context of the ongoing redevelopment of the school and the support given to this by national policy through NPPF paragraph 72.

Lack of Compliance With National Policy Paragraph 83 of the NPPF states that during the preparation or review of the Local Plan, authorities "should consider the Green Belt (and by extension MOL) boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period." In addition para 85 advises that in defining boundaries planning authorities should "...not include land which it is unnecessary to keep permanently open... satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period... [and] define boundaries clearly, using physical features that are readily recognisable and likely to be permanent." Through

NPPF paragraph 72, Local Planning Authorities should take a proactive, positive and collaborative approach to meeting school needs and give “great weight” to the need to expand or alter schools. In the circumstances of SPS, where exceptional circumstances exist, and in light of the need for a positive approach to be adopted in relation to school sites, we do not consider that the Council given due consideration to the MOL boundaries, beyond housing requirements, and their permanence over the course of the Local Plan (2018-2033) contrary to National Planning Policy.

Policy LP 13 (Green Belt, Metropolitan Open Land and Local Green Space)

Proposed Policy LP 13 (and associated paragraphs 5.2.1 to 5.2.7) set out the Council’s proposed position on MOL. The School considers the proposed policy unsound for the following reasons: 1 As currently worded, the policy incorrectly implies that developments outside of MOL have an impact on openness: “When considering developments on sites outside Green Belt or Metropolitan Open Land, any possible visual impacts on the character and openness of the Green Belt or Metropolitan Open Land will be taken into account”. Case law dictates that there is a clear conceptual distinction between openness and visual impact. Openness means “an absence of buildings or development” (Timmins v Gedling BC and Westerleigh (2014)). The degree of openness of a particular area designated as MOL cannot therefore be impacted by adjacent development. 2 Paragraph 5.2.2 notes that MOL: “as shown on the Proposals Map plays an important strategic role as part of the borough’s and London-wide multi-functional green infrastructure network and improvements in its overall quality and accessibility area encouraged. Green chains, including footpaths and open spaces that they link, are important to London’s green infrastructure network, providing opportunities for recreation and biodiversity, and are therefore designed as MOL due to their London-wide strategic importance.” Whilst the role of MOL is recognised and supported by SPS, including MOL land on the School’s east and west playing fields, there is land within the MOL designation at the School that do not meet the criteria for MOL designation as defined by paragraph 5.2.2 and by the London Plan. Accordingly the School considers it essential that the MOL boundary is amended at these areas in order for the paragraph to be accurate.

321	151	Rebecca Doull, GVA on behalf of Lady Eleanor Holles School	Policy: LP 13 Green Belt, Metropolitan Open Land and Local Green Space MOL boundary change sought	No	Yes			<p>We write on behalf of the Lady Eleanor Holles School (LEHS)</p> <p>GVA previously submitted representations on behalf of the LEHS to the consultation on the scope and rationale for the review of planning policies, as well as to the consultation on the pre-publication version of the Local Plan.</p> <p>The focus of our 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 to meet the future growth in identified education need.</p> <p>Our representations presented the planning case for expanding the school, assessed a series of potential development options for expansion, and demonstrated that exceptional circumstances exist. In accordance with national planning policy, it is important that this is recognised as part of the Local Plan process to allow the Council to proactively and positively plan for the identified education need.</p>	<p>In accordance with the NPPF, which advocates a plan-led approach and places great emphasis on the need for local planning authorities to have up-to-date plans in place, the Local Plan should be based on up-to-date evidence about the capacity of existing infrastructure and future need. The evidence-gathering and assessment of education need is something that should be undertaken now, as part of the Local Plan process, rather than at the planning application stage.</p> <p>In addition to objectively assessing infrastructure requirements, the Local Plan must address the release of MOL on school sites to accommodate the provision of new education facilities where there is an identified need and the development potential of land not designated as MOL has been optimised. In accordance with an NPPF-compliant plan-led approach, this should be considered through the Local Plan process, not on the basis of speculative planning applications.</p> <p>The Publication version of the Local Plan does not fully address the education needs of the Borough, nor does it consider the realignment of MOL boundaries for the provision of education facilities where exceptional circumstances have been demonstrated. Therefore, we do not consider the plan currently complies with the NPPF and urge the Council to reconsider our previous representations to amend the Plan accordingly to appropriately plan for the identified education needs of Lady Eleanor Holles School.</p> <p><i>(See Appendix 9 to this document for previous representations Supporting Statement)</i></p>	<p>Comments noted. No changes required as it is considered that the Local Plan fully plans for and addresses the education needs of the borough. It is based upon the Council's School Place Planning Strategy, which is regularly reviewed and updated. In addition, the Council's Infrastructure Delivery Plan, last updated in April 2017, considers in detail the existing infrastructure and future needs.</p> <p>The Local Plan's Spatial Strategy states that the borough's parks and open spaces provide a green lung for south/west London. In addition, there is a presumption against the loss of, or building on, greenfield sites as well as MOL/Green Belt in this borough, unless very special circumstances and/or an exception to relevant policies can be demonstrated. In addition, the Plan demonstrates that the Borough can meet its housing needs without releasing open land that is protected by designations such as Green Belt or MOL. Therefore, a borough-wide Green Belt or MOL review has not been undertaken as part of this Local Plan.</p> <p>With specific reference to the Lady Eleanor Holles Schools, it should be noted that not the entire site occupied by the Lady Eleanor Holles School is designated MOL – there is a substantial area in the middle of the site, which contains the existing school buildings including some adjoining open land (to the north east), which is not designated MOL. As such, there is significant scope for a comprehensive approach to redevelopment and/or expansion, without encroaching into protected MOL. The policy also recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals that deliver significant wider public benefits, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent or improved in</p>
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careful and sensitive development of a small part of the site could deliver substantial and long-lasting benefits to the local community.

It is our view that the sections of the Plan that we have highlighted in Section 3 of this response form are unsound. We attach as part of our representations a report prepared by Barton Willmore titled " Former Imperial College Private Ground, Teddington, Richmond Upon Thames, Landscape and Visual Statement, February 2017", which provides a technical assessment of whether the Local Green Space proposed designation is appropriate. The conclusions of the report are clear and infatic. There is no basis on which to propose the designation of the site as Local Green Space. In summary:

1) Sustainability Paragraph 76 of the National Planning Policy Framework (NPPF) makes clear that the identification of any land as LGS should be 'consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services'. It is our view that the identification of the Former Imperial College Private Grounds as LGS is not consistent with the local planning of sustainable development, and is as such unsound.

2) Criteria for Designation Paragraph 77 of the NPPF states that the designation of LGS should only be used:

- 'where the green space is in reasonably close proximity to the community it serves;
 - where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and
 - where the green area concerned is local in character and is not an extensive tract of land.'
- Paragraph 2.2.3 of the PMCLP states that the Former Imperial College Private Grounds meets all of the following criteria for its designation as LGS:
- 'The site is submitted by the local community;
 - There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;
 - The site is not land allocated for development within the Local Plan;
 - The site is local in character and is not an extensive tract of land;
 - Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves;
 - The Local Green Space is demonstrably special to a local community and holds a particular local significance, for

residents whilst delivering retirement/extra care accomodation to meet an important and increasing need within the community, and delivering sport and recreation facilities on private land for the community 'in perpetuity'; and

- The Strategic Objectives of the PVLP should identify and prioritise the need to meet the accomodation and social infrastructure needs of the elderly sector of the Borough's population, particularly in relation to affordable provision. As set out in our representations (and in the attached report: Care Needs Assessment, March 2016 (Barton Willmore)), our own assessment indicates that there is a shortfall of around 986 units in the elderly care sector (see Table on p.15 of BW Report and shortfall for conventional sheltered housing (leasehold) and extra care sheltered housing. It is our view that the Former Imperial College Private Grounds should not be designated as Local Green Space (under draft Policy LP13) , for the reasons given above (and in the attached report), and that the proposed amendment to the PMCLP relating to the 'Udney Park Playing Fields' should be removed from the draft Local Plan. We continue to support the identification of the site either as a specific site allocation for development (REF: 475) or as OOLTI (with the proposed amendments highlighted above and in our August 2016 representations (REF:166)).

As stated above, the representations made to the Council in August 2016 remain relevant (REFS: 166 & 475). The public consultation undertaken during December 2016, and the formation and active engagement with the TCSGCIC has, however, informed our thinking for the site. We propose to replace the original plan submitted in association with our August 2016 site allocation proposal (REF:475) with an updated plan, as attached. The wording of the proposed policy and supporting text remains unaltered, as set out in our REF:475. We understand the TCSGCIC is likely to make separate representations to the Local Plan.

See Appendix (18) to this document for the Landscape and Visual Statement and Care Needs Assessment.

following sets out a detailed assessment of each criterion of the Local Plan policy, including the corresponding NPPF criteria as set out in paragraph 77:

- The site is submitted by the local community - this criterion is considered to be met as the application has been submitted on behalf of both the Teddington Society as well as the Friends of Udney Park Playing Fields. The Council notes that the Friends of Udney Park Playing Fields, at the time of the application, has circa 300 households as registered supporters, whereas the Teddington Society, whose purpose is to preserve and enhance the quality of life for everyone living and working in Teddington, is by far the largest community group in the locality with very high membership levels. This is a long-established, well organised and respected society, which was formed in 1973 and has been going for over 40 years. In addition, it should be noted that in March 2016 the Udney Park Playing Fields have been designated as "Asset of Community Value", following careful consideration of the criteria and relevant legislation.
- There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation - whilst this criterion is an additional one to those set out in the NPPF, the Council considered that it was important for this to be added as otherwise it could undermine a development for which permission was already granted. It is the case that there is no current planning permission for development on this site. Indeed, the playing fields are designated Other Open Land of Townscape Importance (OOLTI), and the associated OOLTI policy states that these areas will be protected in open use, and enhanced where possible. It is noted that the Quantum Group has carried out pre-application consultations with the local community (the events referred to in the representation were

example, because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife;

- The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means.' It is our view that the Former Imperial College Private Grounds do not meet all of the criteria for designation as listed at paragraph 77 of the NPPF (as set out in our attached report), and that its proposed designation by LBR is therefore unsound. This includes, for example, the fact that the proposed designation of the site as Local Green Space by the Teddington Society and the Friends of Udney Park Playing Fields is not representative of the views of the whole of the local community. We are aware that many of those with a local interest within the community are opposed to this designation, suggesting that the local support for the designation comes only from these two local associations that represent a small group of residents with a narrow objective in mind.

The list at paragraph 2.2.3 of the PMCLP does not correspond with the criteria for LGS designation within the NPPF, and again it is our view that the Former Imperial College Private Grounds do not meet all of the criteria, as claimed.

3) Evidence

Paragraph 5.2.8 of the PVLP states that a LGS 'is green or open space which has been demonstrated to have special qualities and hold particular significance and value to the local community which it serves'. Paragraph 2.2.3 of the PMCLP states that LBR considers that the Former Imperial College Private Grounds has been assessed, and that it fully meets the criteria for designating a LGS as listed at that same paragraph (and referred to above).

It is our view that LBR has not produced any evidence to substantiate their claim that the Former Imperial College Private Grounds meet all of these criteria, and the definition of what a LGS should be. In addition we do not believe that LBR has justified why the site requires the additional protection offered by LGS status, and why such protection is not currently afforded through the existing OOLTI and ACV designations.

Policy 7.18 of the London Plan deals with protecting open space and addressing deficiencies. The policy states, at 'D', that Boroughs should undertake audits of all forms of open space, along with assessments of need, and that these should be qualitative and quantitative. It is therefore interesting to note that the site that LBR refers to as the Udney Park Playing Fields has not been included, or assessed within either the Open Space Assessment Report

not events led by the Council but by the landowner). However, it is not the purpose of the Local Plan-making process to assess potential future developments on designated open land (whether OOLTI and/or Local Green Space) against planning policies.

- The site is not land allocated for development within the Local Plan - this criterion is considered to be met as there is no site allocation for development within an existing or emerging Local Plan.
- The site is local in character and is not an extensive tract of land (this corresponds with the third bullet point of the NPPF criteria) - this criterion is considered to be met as Udney Park Playing Fields are existing playing fields and the site is approximately 13 acres in size, which in an urban setting is a substantial piece of recreational space though within the 5 acres to 50 acres Policy Guidance for Local Green Space.

- Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves (the latter part of this criterion corresponds with the first bullet point of the NPPF criteria) - the Playing Fields are situated in the heart of Teddington, easily accessed on foot or public transport by the community; therefore, this criterion is considered to be met. It is noted that the playing fields are not publicly accessible; however, they are reasonably close to the community it serves.

- The Local Green Space is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife (this corresponds with the second bullet point of the NPPF criteria) - the site is overlooked by local property on all four sides and is very much sited in the heart of the Teddington community. The green space of Udney Park provides

(April 2015), or the Playing Pitch Strategy Assessment Report (May 2015).
LBR published a Summary of Responses to the Pre-Publication Local Plan consultation, to which we contributed representations in August 2016, as referred to above. In response to our representation REF No. 475, relating to our proposal that a new site allocation be made for the site referred to by LBR as Udney Park Playing Fields, LBR responded that 'The Council will not allocate this site for residential/extra care accommodation or any other built development. However, the Council will designate the land as Local Green Space.' No justification or reasoning is provided to back-up LBR's decision not to allocate the site in its own right.
See Appendix (18) to this document for the Landscape and Visual Statement and Care Needs Assessment.

a healthy break in the built-up area of Central Teddington. The playing fields are part of the local as well as part of the wider Green Infrastructure network, and they play, and have the future potential to play, a significant role in the community. It is noted that the Quantum Group has granted a temporary licence to local sports teams, which is encouraged by local planning policies, such as LP 31.

- The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means - the playing fields are designated Other Open Land of Townscape Importance (OOLTI), and the associated OOLTI policy states that these areas will be protected in open use, and enhanced where possible. It is acknowledged that the OOLTI policy is a local policy concerned with the protection of open spaces that contribute to the importance of townscape and local character. Many of these are valued by residents as open spaces in the built up area. The OOLTI Policy LP 14 requires the protection of land designated as OOLTI in open use, and the policy only allows for minor extensions or replacement facilities provided that it would not harm the character or openness of the open land. In the case of Udney Park Playing Fields, a Local Green Space designation would provide some additional protection at a level that is similar to Green Belt and/or Metropolitan Open Land, for which there is both national and regional policy and guidance.

Based on the above, it can be concluded that the application for a Local Green Space designation on this site meets all of the criteria as set out in the Publication Local Plan policy as well as in the NPPF.

In addition, with reference to para 76 of

287	290	Kevin Goodwin, RPS CgMs on behalf of Mr Malachi Trout	Paragraph: 5.2.2 Pages: 55 and 56 Other: Errors in the existing Proposals Map (July 2015) that will be reiterated in the new version of the map.	Yes	No	Yes		Yes	Yes	<p>See Appendix (27) to this document for the photographs and proposed changes.</p> <p>We act on behalf of Mr Malachi Trout, the owner of the property at 61 Belmont Road, Twickenham, TW2 5DA. Our client wishes to challenge two unsound and unjustified designations that affect a small parcel of land located at the rear of his property that is currently occupied by a large garage and hardstanding and remove this parcel of land from the “Metropolitan Open Land” and “Public Open Space” contained in any future version of the Council’s Proposals Map.</p> <p>We submit that the designations affecting the site are unsound and unjustified for the following reasons:</p> <ul style="list-style-type: none"> - The site does not meet any of the criteria set out at Policy 7.17 of the London Plan that must be met to designate land as Metropolitan Open Land (MOL). Retaining the existing boundary of the MOL would be unjustifiable; - The site does not fall within the definition of “Public open space” given by the Publication Local Plan nor within the definition given by the current local plan documents (Core Strategy and Development Management Plan). The site is privately owned, is not accessible to the public and is located on the southern bank of the River Crane, where no public access is possible. Retaining the existing boundary of the “Public Open Space” would be unjustifiable; - The designations that affect the site are the result of an inaccurate analysis of the real boundaries of the adjoining open space to the north and a cartographic error. These wrong assumptions have been reiterated in the latest version of the Proposals Map with a straight line following the rear boundaries of the properties located at the bottom of Belmont Road that does not take into account local characteristics and built up areas such as the site at the rear of 61 Belmont Road. Retaining the existing boundary would be unreasonable. <p>Below is a detailed assessment of the issues summarised above.</p> <p>MOL designation</p> <p>Policy 7.17 of the London Plan deals with ‘METROPOLITAN OPEN LAND’. Paragraph D of the policy reads as follows: <i>To designate land as MOL boroughs need to establish that the land meets at least one of the following criteria: a) it contributes to the physical structure of London by being clearly distinguishable from the built up area 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 c) it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value d) it forms part of a Green</i></p>	<p>Conclusions</p> <p>We request the deletion of the site on the attached plan from the Metropolitan Open Land and Public Open Space designations of the Proposals Map.</p>	<p>Comments noted. No changes required.</p> <p>The Local Plan’s Spatial Strategy states that the borough’s parks and open spaces provide a green lung for south/west London. In addition, there is a presumption against the loss of, or building on, greenfield sites as well as MOL/Green Belt in this borough, unless very special circumstances and/or an exception to relevant policies can be demonstrated. In addition, the Plan demonstrates that the Borough can meet its housing needs without releasing open land that is protected by designations such as Green Belt or MOL. Therefore, a borough-wide Green Belt or MOL review has not been undertaken as part of this Local Plan. It should also be noted that the Mayor of London does not support any release of Green Belt or MOL.</p> <p>Whilst the reasons and justification brought forward by the respondent to review the MOL boundary at 61 Belmont Road are noted, as stated above, MOL boundaries are not being reviewed as part of this Local Plan. With respect to the specific comments provided against the MOL London Plan criteria, it should be noted that this area has been designated as MOL since 1985. It is evident that this site and the overall area fulfil at least 3 out of 4 criteria for designating MOL as defined within the London Plan. Taking these criteria in turn:</p> <p>a) With the exception of the part of the site where the detached garage has been erected, the part of the land designated as MOL contributes to the physical structure of London by being distinguishable from the built up area. The site provides a distinct break from the more prevalent urban fabric of the built up area opposite the River Crane Park MOL. It should also be noted that the MOL boundary follows the backgardens of the row of semidetached houses. In relation to the strategic and wider MOL area, this is of significance to London as a whole or in part, by</p>
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Chain or a link in the network of green infrastructure and meets one of the above criteria.

The supporting text of paragraph 7.56 of the London Plan states: *The policy guidance of paragraphs 79-92 of the NPPF on Green Belts applies equally to Metropolitan Open Land (MOL). MOL has an important role to play as part of London's multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility. Such improvements are likely to help human health, biodiversity and quality of life.*

Development that involves the loss of MOL in return for the creation of new open space elsewhere will not be considered appropriate. Appropriate development should be limited to small scale structures to support outdoor open space uses and minimise any adverse impact on the openness of MOL. Green chains are important to London's open space network, recreation and biodiversity. They consist of footpaths and the open spaces that they link, which are accessible to the public. The open spaces and links within a Green Chain should be designated as MOL due to their Londonwide importance.

The Glossary of the London Plan gives this definition of "Green Chain": *These are areas of linked but separate open spaces and the footpaths between them. They are accessible to the public and provide way-marked paths and other pedestrian and cycle routes.*

Comment

Whilst the designation of the Metropolitan Open Land predates the London Plan, the permanence of this designation in the new version of the Proposals Map would be justifiable only if the areas covered by the designation comply with the criteria set out by the current London Plan. Failure to do so would render the Proposals Map unsound.

The site directly adjoins the row of semidetached houses located in the north-western end of Belmont Road and their rear gardens, is linked to the road by an access serving also vehicles and comprises an area paved with concrete slabs and a concrete platform used as a terrace (See pictures below). For this reasons it is not "clearly distinguishable from the built up area" and fails to meet Criteria a) of Policy 7.17 of the London Plan.

The site has been used for private purposes as ancillary accommodation and private amenity areas for over fifty years and could not be accessed by the public. It does not contain "open air facilities, especially for leisure, recreation, sport, the arts and cultural activities". As such, it fails to meet Criteria b) of Policy 7.17 of the London Plan.

The site is largely built up with a large detached garage used as garden room and external amenity area. The part

providing an attractive break in what could otherwise be a continuous urban development. Therefore, it fulfils criterion 1 of the London Plan policy as this site is 'clearly distinguishable' as a break in the prevailing urban fabric elsewhere in the area. Whether or not there is public access to this site is not part of the MOL criteria for designation. b) It is acknowledged that the site does not contain any open air facilities which serve the whole or significant parts of London and therefore does not meet this criterion.

c) The land designated as MOL itself and in particular the overall area contain features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value. The River Crane corridor is of value to the wider London area – it stretches for 8.5 miles (13.6km) from Hayes in the London Borough of Hillingdon to the Thames at St Margarets, running through a series of open areas. It is also part of the much longer West London green chain which runs for 30km from Harrow to the Thames at Isleworth. The River Crane is also identified within the London Plan as being part of the Blue Ribbon network – a strategically important series of linked spaces. Lack of public access to this particular area does not mean that it is not of metropolitan value as part of the greater whole.

d) It is evident that this site forms a link in the network of green infrastructure and meets one of the above criteria – it provides a link or stepping stone and by virtue of its location adjacent and being considered part of the Crane Park MOL, it is considered of having great importance to the local as well as wider green infrastructure network.

The Council's position is therefore that this piece of land is appropriately designated as it fulfils the required criteria within the London Plan MOL policy. This may therefore be a matter for discussion during the examination process.

of the site that is not built up contains young shrubs and uneven ground with little biodiversity value. The site does not contain historic, recreational or biodiversity features of national or metropolitan value. For this reason, it could not meet Criterion c) of Policy 7.17 of the London Plan. The site is not accessible to the public, is bounded on all sides by impenetrable vegetation and is located on the southern side of the River Crane, where no public access is allowed. Contrary to the northern side of the river, which is linked to other open spaces by a footpath, the site could not be defined as a "Green chain". Even if it was, the site still fails to meet Criteria a)- c) of Policy 7.17 of the London Plan, thus falling to meet also Criteria d) of the same policy.

Public Open Space designation

The Publication version for consultation of the Local Plan defines "Public open space" as follows: *Parks and similar land for public use, whether provided by the Council, or privately, where access for the public is secured by virtue of legal arrangements.*

The definition of "Public open space" given by the current Core Strategy and by the Development Management Plan is more detailed: *Parks, recreation grounds and gardens provided by the local authority or central government for public use even if they are closed at certain times. Public Open Space does not include school playing fields or the amenity areas associated with the development of homes or flats or pedestrian precincts (Local Government Act 1966 Section 8). The River Thames towpath to which the public have unrestricted access is also considered locally to be Public Open Space.*

Comment

The site was fenced off from the adjoining open space in the 1960's and the existing structures on site were built in the 1970's. The site is private and does not have public access. It is surrounded by mature vegetation and does not adjoin any public footpath. It has never been in public use and never will, being extensively used for activities ancillary to the use of the dwelling at 61 Belmont Road. For these reasons, there are no reasonable grounds to maintain that the site is a "Public Open Space" and to reiterate this unjustified designation in the new version of the Proposals Map.

Incorrect drafting of Proposals Map and recurring errors

In addition to the clear shortcomings in the current designations affecting the site, we also submit that the existing designations have been the product of an incorrect desktop-based exercise in cartography that failed to take into account the local characteristics of the area and the clear differences between the built-up site and the adjoining open spaces that adjoin it.

										<p>The site became a private area in the 1960's, before the Metropolitan Open Area designation was conceived, and was developed with ancillary garden room in the 1970's. Since then it has been used by the different owners of 61 Belmont Road as a private space for recreation and ancillary activities.</p> <p>Retaining the current designations would run contrary not only to the current policies of the London Plan outlined above but would also be an example of poor planning practice. Once an error is identified in the drafting of local plans maps, it would be advisable to correct it at the earliest possible occasion. This has not been done in the last thirty years, but should done now that the shortcomings underpinning the designation have been assessed and clarified.</p> <p>We submit therefore that retaining the existing boundary of the Metropolitan Open Land and of the Public Open Space in this location would not only be contrary to the London Plan and the test of soundness set out in the NPPF, but would also be a lost opportunity to rectify an incorrect designation that affects the site.</p>		
395	279	David Taylor	Policy: LP 13 Green Belt, Metropolitan Open Land and Local Green Space Paragraph: 5.2.3 Page: 55 Other: Erroneously claimed Green Belt designation	No					Yes	<p><i>See Appendix (24) to this document for attachments referred to.</i></p> <p>The proposed 2017 Local Plan does not include a correct definitive map of the designated Green Belt within the borough. The council relies on an erroneous Proposals Map from its Unitary Development Plan adopted in October 1996, duplicated in its adopted 2005 Plan, to claim that a small (25m x 55m) parcel of land which I own in Hampton lies within the designated Green Belt. A thorough investigation of the chronology since 1991 of the development plans for Hampton clearly shows that my land is not, and never has been, designated as part of the Green Belt. Furthermore, other maps published by the council, sometimes in the same documents, show my land excluded from Green Belt designation. Thus, the current proposed draft Local Plan is unsound since it has an incorrect map showing Green Belt boundaries.</p> <p><u>The parcel of land / Borough and Green Belt boundaries</u></p> <p>The H.M. Land Registry plan for my parcel of land (outlined in blue) is attached. The whole of this area was originally administered by Spelthorne BC until 1993 when the area to the east of the red line became part of LB Richmond. The red line is the administrative boundary (about which see further below). The green line marks the correct 'straight-line' of the Green Belt's western boundary beside the reservoir, as designated in the 1950's by Spelthorne, following the base of the reservoir embankments. <i>[Attached: marked-up Land Registry location plan]</i></p> <p><u>Chronology</u></p>	<p>I am not challenging the proposed Plan's overall policy LP 13 concerning Green Belt. I am simply requesting that the erroneous inclusion of my land as Green Belt as shown on the maps relied on the council (as per its current stated position per its emails to me) save the SPD which is actually correct, should be corrected to ensure the soundness of draft Plan so that it is based on correctly drawn Green Belt boundaries.</p> <p>This could be achieved by no more than noting in Section 5 of the currently proposed Plan that "<i>The opportunity has been taken to correct an anomalous extended 'dog-leg' of the Green Belt boundary alongside Hampton's Sunnyside reservoir to reflect the historically correct boundary, namely a readily recognisable and likely permanent physical feature in the form of the bank of the reservoir</i>".</p>	<p>Comments noted. No changes required. No borough-wide Green Belt or MOL boundary review has been undertaken as part of this Local Plan as the Spatial Strategy demonstrates that the Council can meet its strategic housing target without using greenfield sites. The area in question has been regarded as Green Belt for over 20 years and the site is within designated Green Belt in the 1996 adopted UDP. It should also be noted that the Mayor of London does not support any release of Green Belt or MOL.</p>

May 1991 Spelthorne BC has very recently confirmed that my land was NOT designated as Green Belt in its 1991 Unitary Development Plan - see email dated 9th January 2017 from Hannah Cook, Planning Policy Officer. For clarity, I attach an enlargement of the 1991 UDP map immediately surrounding my land. The green colouring of the Green Belt can be seen running in a straight line south to north and beside the reservoir, running along the bottom of its embankment. My land is plainly outside the designated Green Belt even though it was, at that time, part of the reservoir land. *[Attached: Spelthorne E-mail and copies of referenced maps/site plan.]*

1993

The administrative boundary changed. The London Borough of Richmond expanded to administer all of the Sunnyside and Stain Hill reservoirs including my small parcel of land adjacent to the administrative boundary but importantly outside the Green Belt. There was no change to the Green Belt designation since this was an administrative change.

Oct 1996 Richmond UDP was adopted. This included two maps that excluded my land from designated Green Belt and one map where it is erroneously included.

The Green Belt policy statement ENV 4 states in section 4.27 that "*The green belt in the Borough is shown on Map 3*" and that "*The Council has amended the green belt boundary through an addition at Hampton*" with the detail shown on Map 4. My land is EXCLUDED from both maps. Section 4.28 makes it clear that the extension to the Green Belt adjacent to my land was simply to extend it southwards into the Thames River and examining Map 4 closely makes it plain that the extension did NOT include any change westwards of the designated area washing over the reservoir beyond so as to include my land located beside it.

The UDP's summary 'Proposals Map' covering the whole of the borough erroneously shows a dog-leg of additional Green Belt that includes, without any supporting text, my parcel of land. In recent correspondence with Richmond council the officers rely on this plan to justify its designation as Green Belt. However, as my analysis makes clear, what has happened is that the Green Belt always excluded my land historically when under control of Spelthorne and when Richmond took over the area administratively it only (several years later) extended the Green Belt south into the Thames and not westwards: both the text and the maps show this. What seems likely is that someone erroneously coloured up to the old administrative boundary in green when colouring the Green Belt in the larger scale 1996 map for the whole borough so as to include my parcel and no-one realised

									<p>the error. <i>[Attached: Richmond 1996 UDP Green Belt Policy ENV 4; Maps 3 & 4; Proposals Map with 'erroneous' dog-leg of Green Belt colouring.]</i></p> <p>2005 The UDP Policy ENV2 on Green Belt did not propose any alterations to the Green Belt while the accompanying Map 2 to which the policy refers appears to show the correct Green Belt boundary as examination shows the boundary to be a straight line south to north (as originally created by Spelthorne council and unaltered since then). This can be compared with the other map showing Hampton (immediately above the Teddington Inset map) that wrongly has the dog-leg boundary shown. <i>[Attached: Richmond 2005 UDP Green Belt Policy ENV2, Map 2; 'erroneous' Proposals map.]</i></p> <p>2016/7 Richmond council has formally confirmed by email on 23.11.2016 that it is "not removing or making any changes to Green Belt boundaries." The proposed draft Local Plan does not currently include a definitive map of the existing designated Green Belt in the borough. However, as part of the LP consultation process, the council published in September 2016 the Hampton draft SPD containing a detailed map of 'Green Infrastructure in Hampton' detailing the local designated Green Belt. This clearly shows the Green Belt boundary directly following the reservoir embankments and EXCLUDING my land. Resident consultation comments have not yet been made available. <i>[Attached: 'Green Infrastructure in Hampton' map from Hampton spd.]</i></p>		
419	285	David Wilson, Savills, on behalf of Thames Water Utilities Ltd	Policy: LP 13 Green Belt, Metropolitan Open Land and Local Green Space	No					<p>Thames Water consider that it is important that Hampton Water Treatment Works (WTW) is continued to be identified as a "Major Developed Site" in the Green Belt as per the current adopted plan.</p> <p>Hampton WTW is Thames Water's second largest works and it will be inevitable that further upgrades will be required over the plan period in increase capacity or meet new standards.</p> <p>Policy Site HA2 Hampton Water Treatment Works, of the earlier Site Allocations plan did identify Hampton WTW as a Major Developed Site. The justification text in the earlier Site Allocations plan was very similar to the wording of Policy ENV 2 (A) of the UDP adopted in March 2005. It is therefore considered that the justification for identifying the site is still valid.</p> <p>Thames Water have a number of other sites which have been continued to be identified as Major Developed Sites in new Local Plans.</p>	<p>Proposed Change: Specifically identify Hampton WTW in Policy LP13 and on the Policies Map as a "Major Developed Site" in the Green Belt as per the current adopted plan.</p>	<p>Comments noted. The designation of 'Major Developed Site' in the Green Belt was discontinued when PPG 2 (Green Belt) was superseded by the NPPF. The NPPF policy in relation to Green Belt as well as the local policy on MOL/Green Belt allow for exceptions to be made to Green Belt policies. In particular, 'essential utility infrastructure' is referred to within the local policy. The Council therefore considers that LP 13 as well as the NPPF policy, particularly the last bullet point of paragraph 89 in relation to redevelopment of previously developed sites, provide sufficient policy guidance for the Hampton Water Treatment Works. No changes required.</p>

22	41	Simon Cartmel	Paragraph 5.2.6 The former Imperial College playing fields at Udney Park Road, Teddington	No					<p>There is a proposal to redesignate the Udney Park Playing Fields as MOL from OOLTI as a means of protecting it from any development. This land is privately owned and was purchased in 2015 when the OOLTI designation applied, with the intention of creating an elderly residential community and care home, which the borough needs, whilst gifting the majority of the site, including a fully developed community centre, sports changing facility and multi use pitches to a Community Interest company, which through its asset lock provisions would secure the site in perpetuity for community use. The site was and is currently fenced off, other than occasional hire was never used by the community since it was private land and was essentially an unused but maintained green space. No wonder the local residents want to keep it that way. The broader community interest is served by creating a vibrant sports and community centre, GP surgery, open landscaped walk area, outdoor gym and a facility for community functions that is lacking in Teddington currently.</p> <p>The council has been resolutely close minded to the opportunity and refuses to entertain the idea of a modest development of required care facilities in exchange for a first class, sustainable facility. On this basis I believe the plan has not been soundly prepared, due to the obvious bias demonstrated by councillors during the processes to date.</p>	<p>The designation of OOLTI is rational and does not need changing. The designation of MOL will only ensure this piece of land remains boarded up, unused by the community. The sheer demographic and social pressures of suburban London, when there are such open spaces such as Bushy and Richmond Parks available, mean that in time this land will come under pressure for development whatever the designation today. The best solution to keep the vast majority of this land in public use is to retain the designation as it is, since MOL will inhibit onward sale and will prevent development. The owners will just board it up and we will have lost a brilliant opportunity to create something of real value for the community.</p>	<p>Comments noted. No changes required. It should be noted that the Local Plan proposes this land to be designated as Local Green Space and not MOL.</p> <p>In relation to the Local Green Space designation, see Officer response to Comment ID 9 above and Comment ID 324 below.</p> <p>Also see the Officer response in the separate Proposal Map Changes document in relation to Comment ID 4.</p>
206	118	James Stevens, Home Builders Federation Ltd	Policy LP14: Other Open Land of Townscape importance	No					<p><u>We consider that the policy is unsound because it is unjustified owing to the size of the unmet housing need.</u></p> <p>The Council needs to review these designations in view of the unmet housing need. Like Brighton & Hove Council which was required by the examining Inspector to <i>“leave no stone unturned”</i> in order to find more land to accommodate a larger element of Brighton’s very large unmet need (which is circa 18,000 homes) so ought to Richmond Council. These designations have not been reviewed since the last Core Strategy.</p> <p>National planning policy requires local authorities to meet objectively assessed needs <i>“unless the adverse impacts of doing so would significantly outweigh the benefits”</i> (NPPF, paragraph 14). We are not convinced that the continued protection of all these townscape designations does outweigh the importance of addressing more of the unmet need.</p>		<p>Comments noted. The Council considers that the Plan meets the tests of soundness and that it is consistent with national policy and guidance. The Borough has been able to meet and exceed the London Plan target as prescribed in the London Plan 2016. Therefore, there is no conflict with the NPPF as paragraph 14 makes clear that needs should not be met if: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted. It should also be noted that the majority of designated OOLTI has been identified and designated due to their townscape importance, their contribution to the local character and their value to the local residents as open spaces and green oases in what is generally a quite built up area. No changes required.</p>

200	280	Simon Cartmell, Teddington Community Sports Ground CIC	Local Green Space - Udney Park Playing Fields, Teddington Local Plan Proposals Map Changes: Page Numbers 3-4 (Section 2.2), Udney Park Playing Fields, Teddington, Map Page 3, Paragraph 2.2.1 Publication Local Plan: Page Numbers 54-58, Paragraph Numbers 5.2 & 5.3 (inc/ sub paragraphs), Policies LP13 & LP14 Other: Quantum Group's previous representations (REF: 475)	No	Yes	Yes	Yes	Yes	<i>See Proposals Map Changes Comment ID 78</i>	<i>See also Proposals Map Changes Comment ID 78</i> We propose that at the end of paragraph 5.3.6 the following additional words are included: " and usability by the community". The intention of this proposed amendment is to make the policy interpretation clear that if a comprehensive approach to the site is being put forward then access to the site by the local community and the local community's ability to use the site and facilities will be relevant and important considerations in determining if a proposal should be supported. The policy, in our view, should not be only about size because this is a blunt way of evaluating whether a proposal is overall beneficial, even though some parts of the proposal may be negative. Without our proposed modification it might be possible to narrowly apply the policy, which is not, in our view, in the community interest. For example whilst the proposal removes an amount of grass surface, it is proposed that it is replaced with 2 multiuse artificial surfaces with are recognised as being able to sustain 3-4 times the use of traditional grass, thus increasing both the extent of usable surface area and, given weather considerations, the usability of the space.	Comments noted. No changes required. The OOLTI policy and its criteria for designation do not require land to be publicly accessible and/or usable by the community. Therefore, the change proposed by the respondent would substantially alter the long-standing requirements for OOLTI designation. It is also considered inappropriate to require 'usability by the community' in comprehensive redevelopment schemes as the focus of this policy is to provide the same or improved amount of open space in terms of quantum, quality and openness, whereas 'usability by the community' or 'public access' are not OOLTI criteria.
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278	264	Vicky Phillips, South West London Environment Network	LP 15 Biodiversity and paras. 5.4.1, 5.4.3, 5.4.6, 5.4.8,	No			Yes	Data sharing - data on biodiversity needs to be supplied to the Richmond Biodiversity Partnership as well as to GIGL.	<p>LP15A - include the London Borough of Richmond Nature Conservation Strategy in the list of documents after the Biodiversity Strategy for England "Biodiversity 2020".</p> <p>LP15A - include new point 7. "protecting dark corridors and their linkages to support nocturnal species".</p> <p>5.4.1 At end of clause add "It is also important that dark corridors and linkages are protected to support biodiversity of nocturnal species."</p> <p>5.4.3 add "- and the Secretariat of the Richmond Biodiversity Partnership" at the end of the clause.</p> <p>5.4.6 Insert the words "external lighting" into the second sentence after "buildings".</p> <p>5.4.8 third line after "important wildlife sites" add "and connectivity".</p>	<p>Comments noted.</p> <p>The reference to the Biodiversity Strategy for England is considered to be sufficient and also ensures the longevity of the Plan in case 'Biodiversity 2020' is being updated.</p> <p>In relation to 'dark corridors', the Local Plan and its Proposals Map do not include provision of a 'dark corridor' designation; there is no evidence base for designating 'dark corridors' and therefore it is considered inappropriate to include this within the Plan. It is acknowledged that the effects of lighting, amongst other things, can undermine the ecological value, but it should be noted that the Council's Local Plan and its policies need to be read as a whole. Therefore, in determining planning applications, any potential impacts on habitats and/or species such as bats, will be considered in accordance with the Council's planning policies, including policies on biodiversity, open land, river corridors and floodlighting. It is not considered necessary to add specifically the Secretariat of the Richmond Biodiversity Partnership as there is an assumption that local biodiversity and environment groups are liaising with GiGL on ecological data. The Council is minded to consider the following two minor amendments:</p> <ul style="list-style-type: none"> - in paragraph 5.4.6, add the phrase '<u>external lighting</u>' into the second sentence after 'buildings' - in paragraph 5.4.8, add the phrase '<u>and connectivity</u>' after 'important wildlife sites'.
383	70	James Togher, Environment Agency	Policy: LP 15 Biodiversity	Yes	Yes			<p>See also Publication Local Plan comment, Objective ID 380</p> <p>We welcome this policy and the need to protect and enhance biodiversity across the borough not just at designated sites.</p>	<p>Comments noted. Support is welcomed.</p>	

208	118	James Stevens, Home Builders Federation Ltd	Policy LP17: Green roofs and walls	No							<p><u>The policy is potentially unsound because it is unjustified. The failure to fully account for the cost of the local policy is contrary to national planning policy.</u></p> <p>The policy requires green/brown roofs in all major developments. The national definition of 'major development' is ten dwellings or more. The policy needs to clarify what it considers constitutes 'major' developments.</p> <p>The NPPF also requires local authorities to assess the full, cumulative costs of local and national policies. We note that the Whole Plan Viability Assessment (December 2016) has assessed the impact of this cost for flats only (paragraph 10.4.1). Unless the Council has assessed the impact of this cost for all development types we cannot see how it can specify that all major developments comply with this policy.</p>	<p>Comments noted. No changes required. The Council already has an existing adopted policy (as set out within the Development Management Plan), which is considered to be more onerous than the revised policy in this Plan. This is because the current adopted policy applies to all developments rather than major developments only. Overall, the policy requirement is considered to be viable for major developments, and the Whole Plan Viability Assessment in particular assessed flats. Should a major development scheme contain houses rather than flats, it is most likely that green roofs aren't technically feasible due to pitched roofs in houses. The Council also takes account of evidence and justification provided by an application should a green roof not be feasible or viable -this is reflected in the last sentence of paragraph 5.6.4, which states that 'The Council will take into account relevant viability information.'</p>
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294	237	Neil Henders on, Gerald Eve LLP on behalf of Reselton Properties Ltd	Policy LP 17 Green Roofs and Walls	No	No	Yes			Yes	<p>We write on behalf of our client, Reselton Properties Limited, to submit representations on the Publication Local Plan, which is available for consultation until 15 February 2017.</p> <p>Our client completed the purchase of the Stag Brewery site in Mortlake in December 2015 ('the site') and is currently progressing with plans to comprehensively redevelop the site to deliver a high quality mixed use scheme. Pre-application discussions are ongoing with The London Borough of Richmond Upon Thames ('LBRuT') Council officers and other relevant bodies, with a view to submitting a planning application later in 2017. The plans for the site are being developed with reference to the adopted Stag Brewery Planning Brief SPD (July 2011) and the Development Plan.</p> <p>On behalf of our client, we previously prepared and submitted a response to the pre-publication-version of the draft Local Plan, which was available for consultation between 8 July 2016 and 19 August 2016. We enclose a copy of these representations at Appendix 1 for your reference. We have not sought to repeat the comments set out in our original representations but, for the avoidance of doubt, we remain of the view that those suggestions made which have not been taken forward should be incorporated prior to submission of the Local Plan. We have also reviews the Council's response ('the Council's response') to our comments raised during the 2016 consultation and refer to these responses where appropriate.</p> <p>We set out below our comments on the Publication Local Plan.</p> <p>See Appendix 19 in this document for a copy of their Pre-Publication Consultation Representation submission.</p>	<p>Our comments still stand in that we consider the draft Policy as currently worded to be too narrowly focused on the provision of green roofs and walls. There are a range of sustainable design methods (such as the provision of ponds, parks etc.) which will also deliver biodiversity and ecological benefits.</p> <p>Our comments relating to roof terraces still stand but we note the Council's response with regard to concern over amenity and privacy. Therefore, we consider that the supporting text should make reference to the fact that roof terraces, where appropriate, and with due consideration to impacts on amenity, privacy and visual intrusion, can contribute to the aim of the Policy.</p>	<p>Comments noted. It is acknowledged that a green wall may not always be suitable, therefore, a reference to 'where appropriate' is already included within the Plan. Whilst there may be circumstances where a green roof could act as a roof terrace, in general, roof terraces are likely to cause issues in relation to amenity, privacy and visual intrusion. Therefore, any such proposals would need to be considered on a case by case basis. No changes required.</p>
384	70	James Togher, Environment Agency	Policy: LP 17 Green Roofs and Walls		Yes	Yes				<p>See also Publication Local Plan Comment ID 380</p> <p>We support this policy as green roofs and walls can deliver multiple environmental, social and economic benefits and be integrated into sustainable drainage systems.</p>		<p>Comments noted. Support is welcomed.</p>

14	207	James Page	Paragraph 5.6.4/5		No					<p>The 70% is unclear.</p> <p>Also the remark that green roofs improves efficiency may be theoretically true but the effect is not significant. Experiment results from green roof suppliers have not been backed up. Combining is possible but at increased cost.</p> <p>The bigger problem is that green roofs and solar PV are competing for space, and this section is more specific about green roofs being deployed than Section 6 is about solar PV (which only talks of CO2 ie is technology neutral.) Consequently it is easy to avoid solar PV.</p>	remove remark on PV efficiency in 5.6.5	<p>Comments noted. A minor change is proposed in paragraph 5.6.5 as follows: "Green roofs and photovoltaic panels or solar thermal units can be used together and green roofs <i>may</i> increase the efficiency of solar photovoltaic panels by regulating temperature."</p> <p>In relation to the 70%, the policy is clear as it states that at least 70% of any potential roof plate areas should be used as a green / brown roof. Paragraph 5.6.4 explains this further and states that the total roof plate area includes space for renewable energy solutions etc.</p>
13	207	James Page	Paragraph 5.6.4		No	Yes				<p>This section is unclear ie 70% of... PV is competing for space with the green roof</p>		<p>See Officer response to Comment ID 14 above.</p>
196	223	Helena Payne, Port of London Authority	Policy LP 18 River corridors Policies: LP18 & LP19, LP44 Pages: 64-68 & 143-148 Paragraphs: 5.7 to 5.8.2 & 11.1.12	Yes	No	Yes	Yes	Yes	Yes	<p>Previous representation from the PLA advised that we would wish to see the evidence base that supports providing new public access to the foreshore. The PLA has not has sight of this yet. The Council will be aware there are health and safety issues associated with accessing the foreshore such as rapidly rising tides and accessing the foreshore can have an adverse impact on its environment - contrary to the Council's desire to protect and enhance the natural environment. It is questioned whether the Council is seeking (via Policy LP 18) for any member of the public to walk from the riverbank onto the foreshore or rather whether it is seeking through the policy for opportunities for organised activities such as rowing, stand-up paddle boarding etc. to be realised.</p> <p>The submitted draft report still has not made reference to the need to encourage riparian lifesaving equipment (e.g. grabs chains, access ladders and life bouys) as part of future riverside developments.</p> <p>The Council's approach to riverside use is welcomed, it is however considered that the policy should set out its support for riverside development to seek to utilise the river for the transportation of construction waste and materials wherever possible.</p> <p>I presently cannot see where these comments have been incorporated into the next draft, and where justifications have been requested, I cannot see where and if these have been given.</p>		<p>Comments noted. The Council is seeking through the policy for opportunities to gain access to the riverside, and only where appropriate to the foreshore. It is acknowledged that there are health and safety issues associated with access to the foreshore. To address the PLA's concern in relation to safety, the following minor change is proposed to LP18:</p> <p>- Public Access C. c. to read as follows: "Provide new public access to the riverside where possible, <u>and where appropriate and safe to the foreshore.</u></p> <p>There is an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside."</p> <p>The Council is also willing to consider adding a new criterion C.d. to read as follows: "<u>Provide riparian life-saving equipment where required and necessary.</u>"</p> <p>With respect to the transportation of construction waste and materials, policy LP 24 on waste management requires development proposals, where appropriate, to make use of the rail and the waterway network for the transportation of construction, demolition and other waste. No change required.</p>

268	222	Kevin Scott, Kevin Scott Consultancy Ltd on behalf of Port Hampton Estates Limited	Policy LP 18 (E) Riverside uses, including river-dependent and river-related uses							<p>We represent the owner of Platts Eyot, Port Hampton Estates Limited. We wish to make the following comments on the Local Plan Public Publication document published for consultation in January 2017. These comments should be read in conjunction with the comments made to the pre-publication version in July 2016 included in Appendix 1.</p> <p>See Appendix 16 in this document for a copy of the appendix referenced above.</p> <p>Policy LP18 E Riverside Uses</p> <p>We support the changes made to this policy in this version of the Plan in response to our previous representations in July 2016.</p>		Support welcomed. No changes required.
234	83	Rob Gray, Friends of the River Crane Environment (FORCE)	Broadly supports policy on River Corridors LP 18	No						<p>LP18: FORCE broadly supports the proposals in LP18. However, FORCE considers that the proposals need to better reflect the following issues and opportunities: LP 18 - considers river corridors and sets out an expectation that proposed developments adjacent to all river corridors "contribute to improvements and enhancements to the river environment." However, 5.7.4 regarding the River Crane corridor says; "when appropriate", regarding the requirement for development to contribute.</p> <p>SA9, SA10 and SA11. When considering these individual sites adjacent to the Crane and the DNR, the policy states that; "Any development proposal is required to protect, and, where possible, enhance the River Crane corridor. SA12 contains no stipulations for the River Crane despite the large length of river frontage.</p> <p>In our view the words "when appropriate" and "where possible" significantly dilute the requirements of LP18 when applied to the River Crane and those sites along it that are likely to be subject to development. SA12 clearly fits the requirements of LP18 as a development adjacent to a river corridor and the requirements need to reflect this.</p> <p>Section 5.7.4 states; "continuous accessible link between Hounslow Heath and Twickenham Station (which is now largely realised)". FORCE would note:</p> <ol style="list-style-type: none"> 1. There have been positive steps towards realising this ambition - but it is not correct to say it has been largely realised 2. The ambition, set out by FORCE and embraced by the Crane Valley Partnership of which LB Richmond is a member, has also been enlarged to include the river downstream of Twickenham Station to the Thames. This includes the Tidal Crane (The Tidal Crane Association has been operating in this area for 40 years and is not 	<p>5.7.4 remove the words "when appropriate" regarding the requirement for development to contribute. SA9, SA10 and SA11. Remove the words "where possible" from the sentence "Any development proposal is required to protect, and, where possible, enhance the River Crane corridor". If necessary replace these words with; "Is expected to".</p> <p>SA12: add the words; "Any development proposal is required to protect and enhance the River Crane corridor".</p> <p>Section 5.7.4: change the words; "continuous accessible link between Hounslow Heath and Twickenham Station (which is now largely realised)", to; "continuous accessible link between Hounslow Heath and the River Thames, incorporating river restoration works along the lower Crane. This work is being delivered by the Crane Valley Partnership, which includes LB Richmond, GLA, Environment Agency as well as FORCE and the Tidal Crane Association in its 26 members".</p>	<p>Comments noted.</p> <p>LP 18 applies to all the Borough's river corridors including the River Crane. Requiring all development to contribute to a new metropolitan park, however minor, seems overly onerous. Therefore, it is necessary for the words "where appropriate" to be retained. This also applies to the words "where possible" in relation to enhancement to the River Crane corridor. The policy is clear that any development proposal is required to protect the River Crane corridor, and the reference 'where possible' only applies to enhancements. No changes required.</p> <p>The Council agrees to propose a minor change in paragraph 5.7.4 to correct a factual error: "Where appropriate, developments alongside and adjacent to the River Crane should contribute to the overarching aim of creating a new metropolitan park that provides a continuous, accessible link between Hounslow Heath <u>and the River Thames</u>, incorporating river restoration works along the lower Crane, including a long distance footpath, improved access for surrounding communities and an enhanced wildlife corridor." However, it is not considered appropriate or necessary to refer to the partnership and the various bodies and organisations that are delivering these works to ensure longevity of the Plan and to avoid it from</p>

									referenced in the Local Plan) and encompassing plans for extensive river restoration works. In our view the Local Plan needs to reference these plans to be effective in protecting and enhancing the river corridor. FORCE notes that the original Council intention in the draft plan was to remove the Lower Crane Valley SPG from the Plan. We also note that Council response 180 to the Local plan consultation (setting out the response to our LP submission) states that the SPG for the River Crane will now be retained. However, we can see no reference to the SPG within the latest version of the Local plan and are concerned that it has not been retained within the Plan.		becoming out of date very soon.
276	264	Vicky Phillips, South West London Environment Network	LP18 River corridors.		No			Yes	River corridors - the wording regarding development along the River Crane needs to be consistent with LP18A which we support, to refer to the Lower Crane Valley SPG and to include the ambition to open up access to the river downstream of Twickenham station.	5.7.4 Remove the words "Where appropriate" as all development should contribute to this aim. Amend the clause to refer to "a continuous, accessible link from Hounslow Heath to the Thames" and remove the words "which has now been largely realised". Insert a reference to the Lower Crane Valley SPG.	Comments noted. See the Officer response to Comment ID 234 above.
267	222	Kevin Scott, Kevin Scott Consultancy Ltd on behalf of Port Hampton Estates Limited	Policy LP 18 (C) Public Access						We represent the owner of Platts Eyot, Port Hampton Estates Limited. We wish to make the following comments on the Local Plan Public Publication document published for consultation in January 2017. These comments should be read in conjunction with the comments made to the pre-publication version in July 2016 included in Appendix 1. See Appendix 16 in this document for a copy of the appendix referenced above. Policy LP18 C. Public Access This policy, in respect of public access to the riverside states that: <i>C. All development proposals alongside or adjacent to the borough's river corridors should:</i> <i>a. Retain existing public access to the riverside and alongside the river; and</i> <i>b. Enhance existing public access to the riverside where improvements are feasible; or</i> <i>c. Provide new public access to the riverside and the foreshore where possible.</i> <i>There is an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside and foreshore.</i> While we support the principle of this policy, it must be	Our previously suggested changes have not been made and therefore we wish to request the same change to this policy as follows: <i>"c. Provide new public access to the riverside and the foreshore where possible. There is an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside and foreshore unless site specific characteristics would prevent this."</i>	Comments noted. No changes proposed in this regard. The Council will take into account site specific characteristics and circumstances, which would be assessed on a case by case basis. It is the Council's view that the onus should be on the developer to work with adjoining landowners, where necessary, to gain public access to the riverside, where this is not yet available, and ensure that proposals provide wider public benefits, especially benefits to the local community.

											acknowledged that in some cases the use of the site, its character or ownership issues would prevent this.		
349	113	Katharine Fletcher, Historic England	Policy: LP 18 River Corridors Page: 64/65								See Publication Local Plan Comment ID 340	We support this policy and the reference to the historic environment at the beginning. The historic landscapes along the Thames are a key strategic heritage asset and this policy should link to a separate policy coverage of historic landscapes, as suggested above.	Comments noted. Support is welcomed. It is not considered necessary or appropriate to include various cross-references within the policies of the Plan as the Plan should be read as a whole.
298	237	Neil Henders on, Gerald Eve LLP on behalf of Reselton Properties Ltd	LP 18 River Corridors	No	No	Yes				Yes	See also Publication Local Plan comment, Objective ID 294 See Appendix 19 in this document for a copy of their Pre-Publication Consultation Representation submission.	<p>We note the Council's response in respect of part D of the draft Policy that the onus should be on the developer to work with adjoining landowners and, where necessary, to gain public access to the riverside, where this is not yet available. We agree with this approach and the Council's aim to enliven the riverside spaces.</p> <p>However, the Council's response does not recognize that this requirement will be assessed on a site by site basis. Land ownership issues can be complex and, it may not always be possible to deliver public access to the riverside. This is not always within the control of the developer or the Council and policy should be flexible enough to account for these particular circumstances. Therefore, we consider that part D of the draft Policy should be amended to read:</p> <p>"All development proposals adjoining the River Thames are required to provide a public riverside walk, <u>unless exceptional circumstances can be demonstrated, including for pedestrians and cyclists, which will contribute to the overarching aim of providing continuous publicly accessible riverside walk. For major developments, applicants will be expected to work with adjoining landowners in case ownership issues would prevent public access.</u>"</p> <p>We note that our comments on part E points 2 and 3 have not been incorporated. We acknowledge the Council's response in respect of point 2 but still consider that point 3 should be made more flexible to allow for instances where the site may not be appropriate to come forward for river-dependent uses.</p>	<p>Comments noted. The Council will take into account site specific characteristics and circumstances, which would be assessed on a case by case basis. It is the Council's view that the onus should be on the developer to work with adjoining landowners, where necessary, to gain public access to the riverside, where this is not yet available, and ensure that proposals provide wider public benefits, especially benefits to the local community.</p> <p>With respect to Part E point 3, it is the Council's view that this is appropriate and sufficiently flexible. The policy requires either an assessment of the effects of a proposed development on the operation of existing uses, or the potential of the site for river-dependent uses and facilities if there are non existing. Once such an assessment has been provided by the applicant, the Council will take account of this and may on a case by case basis acknowledge that an individual site may not be capable or viable for river-dependent uses.</p>

385	70	James Toghher, Environment Agency	Policy: LP River Corridors		Yes	Yes					<p>[See also Publication Local Plan comment, Objective ID 380]</p> <p>We welcome this new policy and the importance placed on new development contributing to improving the river environment river corridors across the borough.</p> <p>"Development adjacent to the river corridors will be expected to contribute to improvements and enhancements to the river environment." (Page 64)</p> <p>Successful delivery of this policy requires continued close partnership working with community groups, charities and the Environment Agency to identify potential improvement projects and funding.</p>	Comments noted. Support is welcomed.
197	223	Helena Payne, Port of London Authority	Policy LP 19 Moorings and Floating Structures Policies: LP18 & LP19, LP44 Pages: 64-68 & 143-148 Paragraphs: 5.7 to 5.8.2 & 11.1.12	Yes	No	Yes		Yes	Yes	<p>The evidence box appears to suggest that there is a need to ensure that any proposal for houseboats, moorings and other floating structures safeguard the character/openness of the River, this is not reflected in Policy LP 19 which has a presumption against houseboats). Still require definitions for houseboats, residential moorings, temporary and permanent moorings.</p>	<p>Consideration of the PLAs comments/concerns and request for further information should be given before appropriate and sound consideration can be given.</p> <p>Comments noted. No changes required. The policy sets out a presumption against new or extensions to existing houseboats. Part B safeguards the character, openness and views of the river. It is not considered necessary to include definitions as they would be those used in common English parlance and meaning associated with "Houseboat", "Residential mooring", "temporary" and "permanent", as set out in the Oxford English Dictionary.</p>	

269	222	Kevin Scott, Kevin Scott Consultancy Ltd on behalf of Port Hampton Estates Limited	Policy LP 19 Moorings and Floating Structures							<p>We represent the owner of Platts Eyot, Port Hampton Estates Limited. We wish to make the following comments on the Local Plan Public Publication document published for consultation in January 2017. These comments should be read in conjunction with the comments made to the pre-publication version in July 2016 included in Appendix 1.</p> <p>See Appendix 16 in this document for a copy of the appendix referenced above.</p> <p>Policy LP 19</p> <p>This policy, in respect of mooring and floating structures states that:</p> <p><i>“B. A mooring or other floating structure will be supported if it complies with the following criteria:</i></p> <ol style="list-style-type: none"> <i>1. it does not harm the character, openness and views of the river, by virtue of its design and height;</i> <i>2. the proposed use is river-dependent or river-related;</i> <i>3. there is no interference with the recreational use of the river, riverside and navigation; and</i> <i>4. the proposal is of wider benefit to the community.”</i> <p>Our previous changes set out in July 2016 have not been incorporated. The purpose or meaning of “wider benefit to the community” in this policy is meaningless and difficult to quantify in respect of the submission of any planning application.</p> 	The previous three criteria in this draft policy provides sufficient control over the provision of such structures in the river. For these reasons we request that criteria 4 is deleted from the policy.	Comments noted. No changes required. The River Thames is of particular local importance, especially as Richmond is the only London borough spanning across two sides of the River Thames. It is considered an important and highly valued public asset. Therefore, the Council is of the view that criterion 4 should be retained to ensure moorings and other floating structures are of wider benefit to the local community, such as for example providing mooring for pleasure craft and enjoyment of the river.
386	70	James Togher, Environment Agency	Policy: LP 19 Moorings and Floating Structures	Yes	Yes					<p>See also Publication Local Plan comment, Objective ID 380</p> <p>We support this policy to ensure the river corridors are protected from inappropriate development such as large floating structures which can cause environmental damage and reduce the enjoyment of the river corridors for other river users.</p>		Comments noted. Support is welcomed.
387	70	James Togher, Environment Agency	Policy: LP 20 Climate Change Adaptation	Yes	Yes					<p>See also Publication Local Plan comment, Objective ID 380</p> <p>We support this policy and the need for new and existing development to adapt to more extreme weather events. The evidence on climate change is regularly reviewed and updated so its important the policy takes account of the latest evidence.</p>		Comments noted. Support is welcomed.

178	285	David Wilson, Savills, on behalf of Thames Water Utilities Ltd	Policy LP21 - Flood Risk and Sustainable Drainage	Yes	Yes	Yes					<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"> • improve water quality • provide opportunities for water efficiency • provide enhanced landscape and visual features • support wildlife • and provide amenity and recreational benefits. <p>Thames Water therefore support the section on Sustainable Drainage of Policy LP21.</p> <p>In relation to flood zone 1, Thames Water support the requirement for 'A Drainage Statement is required for sites all major developments. Required for all other development proposals where there is evidence of a risk from other sources of flooding, including surface water and sewer flooding'.</p>	Comments noted. Support is welcomed.
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388	70	James Togher, Environment Agency	Policy: LP 21 Flood Risk and Sustainable Drainage	Yes	Yes					<p>See also Publication Local Plan Comment ID 380</p> <p>We are pleased to see the focus on managing flood risk and climate change and the importance of new development taking account of the Thames Estuary 2100 (TE2100) plan and the River Thames scheme to manage flood risk and climate change. We support the new policies to protect and improve flood defences and include buffer zones between new development and flood defences/river edge of eight metres on main rivers and sixteen metres on the tidal River Thames. This helps to make space for water and ensure access to flood defences for maintenance and potential future replacement.</p> <p>We welcome this new policy and importance of steering new development to the lowest flood risk zones wherever possible through applying the Sequential Test. We support the new policy on protecting and enhancing flood defences and ensuring new development follows the actions from the Thames Estuary (TE2100) and River Thames Scheme through buffer zones between new development and flood defences and quality Flood Risk Assessments. We support the policy 21 (b) (page 73) to restrict self contained basements and bedrooms accommodation in Flood Zone 3b and 3a.</p>	<p>We recommend a minor amendment (in italics below) to clarify the policy objectives to prevent self-contained basements/bedrooms in the highest risk flood zone within the tidal breach/fluvial. We feel the current wording seems to restrict basement bedrooms within areas of low/no breach hazard and Flood Zone 2 but not within the areas of breach in Flood Zone 3a.</p> <p>In areas of Extreme, Significant and Moderate Breach Hazard (as set out in the Council's SFRA):</p> <p>New basements: restricted to Less Vulnerable / Water Compatible use only.</p> <p>'More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed. Bedrooms at basement level will not be permitted.</p> <p>'Highly Vulnerable' such as self-contained basements/bedrooms uses will not be permitted.</p> <p>We are keen to work with you to develop local guidance and advice on key flood risk and planning issues such as basements and development next to flood defences. It is essential reference is made to the new climate change allowances in the Flood Risk Assessment supporting text to ensure developers consider this as part of the planning application process and in the Flood Risk Assessments. We recommend the following minor addition to be added to Section 6.2.8 (page 75) on Flood Risk Assessments.</p> <p><i>All new development needs to take account of the latest climate change allowances. This should be included as part of the Flood Risk Assessment process. This will help minimise vulnerability and provide resilience to flooding in the future</i></p> <p>https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</p>	<p>Comments noted. Support is welcomed.</p> <p>The following changes are proposed to ensure the policy clearly reflects the evidence and recommendations as set out in the Council's SFRA and/or in national planning policy and guidance:</p> <ul style="list-style-type: none"> - add after 'More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed. <u>Bedrooms at basement level will not be permitted.</u> - add after 'Highly Vulnerable' <u>such as self-contained basements/bedrooms</u> uses will not be permitted. - add after paragraph 6.2.8: <u>'All new development needs to take account of the latest climate change allowances. This should be included as part of the Flood Risk Assessment process. This will help minimise vulnerability and provide resilience to flooding in the future.'</u> <p>In addition, for clarity, the Council proposes a minor change to insert in brackets '<u>where applicable</u>' following 'after passing the exception test - this applies to zone 3a and zone 2. This is to ensure the policy reflects the national policy guidance.</p>
405	169	Brianne Stolper, Greater London Authority on behalf of Mayor of London	Policy: LP 21 Flood Risk and Sustainable Drainage Subterranean developments and basements							<p>The addition of a reference to restricted uses including self-contained units and bedrooms at basement level is welcomed. [See also Publication Local Plan Comment ID 40 for general/supporting comments made by the GLA on the Publication Local Plan, including references to previous correspondence]</p>	<p>Comments noted. Support is welcomed.</p>	

177	285	David Wilson, Savills, on behalf of Thames Water Utilities Ltd	Policy LP22 - Sustainable Design and Construction	Yes	Yes	Yes					<p>The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water supports water conservation and the efficient use of water and the references to this in Policy LP 23 itself. Thames Water also support the mains water consumption target of 110 litres per head per day as set out in the NPPG (Paragraph: 015 Reference ID: 56-015-20150327) and the specific reference to this in Policy LP22.</p> <p>Thames Water have a water efficiency website: https://www.thameswater.co.uk/save-water</p> <p>Customers can discover how you can start saving water, help protect the environment, reduce your energy bill and even cut your water bill if you have a meter. You can calculate your water use, see how you compare against other Thames Water customers and the Government's target, and get lots of hints and tips on how to save water. Thames Water customers, can also order a range of free devices to help save water. The Policy/supporting text could make reference to this guidance.</p> <p>However, managing demand alone will not be sufficient to meet increasing demand and Thames Water adopt the Government’s twin-track approach of managing demand for water and, where necessary, developing new sources, as reflected in the latest Thames Water Water Resource Management Plan.</p>	<p>Comments noted. Support is welcomed. Note that paragraph 6.3.3 already states that London is classified as 'seriously' water stressed.</p>
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209	118	James Stevens, Home Builders Federation Ltd	Policy LP22: Sustainable design and construction							<p><u>In accordance with the London Plan the Council requires all new homes to be zero carbon. The requirement is unjustified because it is unclear if the Council has adequately factored into its Viability Assessment the cost of this policy.</u></p> <p>Paragraph 10.4.4 states that:</p> <p><i>“we have assumed for other elements of sustainable design that the costs of this are already taken into account through other allowances.”</i></p> <p>It is unclear what these other allowances are and whether they are adequate to accommodate the considerable costs associated with building zero carbon homes. The DCLG report Housing Standards Review: Cost Impacts (September 2014) has not provided an assessment of the cost of building zero carbon homes because the Government has decided not to take this policy forward, as announced in Fixing the Foundations (HM Treasury, July 2015). The report updates the costs to Part L 2013 (the new Part L that came into effect from 6 April 2014).</p>	The Council needs to explain what allowance it has factored in for zero carbon homes.	<p>Comments noted. No changes required. Policy LP 22 adopts the CO2 emission reduction targets as set out in the London Plan, which has been tested for viability as part of the Further Alterations to the London Plan. This policy is supported by the Mayor of London as it requires major residential developments to meet the zero carbon target (as of October 2016). It should be noted that applications submitted since October 2016 are already complying with this policy requirement.</p> <p>National policy and guidance, in the form of the NPPF, provides a framework within which local councils can produce their own distinctive local plans, which reflect the needs and priorities of their communities. The inclusion of the zero carbon homes requirement is therefore considered to be consistent with the NPPF’s aims of promoting the mitigation and adaptation to climate change including moving to a low carbon economy. As part of the Further Alterations to the London Plan process, the Greater London Authority has tested the viability of the zero carbon homes policy and it was concluded that it would not compromise housing viability and deliverability within London. It is therefore considered to be acceptable to align the Local Plan policy on mitigation of climate change with the targets set in the London Plan. The Whole Plan Viability Assessment has also taken account of sustainable design costs that are already being required and asked for as part of the London Plan. This Local Plan is therefore not introducing a new requirement in this regard.</p>
303	237	Neil Henders on, Gerald Eve LLP on behalf of Reselton	Policy LP 22 Sustainable Design and Construction	No	No	Yes			Yes	<p>See also Publication Local Plan Comment ID 294</p> <p>We welcome the amendments to the draft Policy, which now seeks to adopt the same approach as the GLA to carbon emissions.</p> <p>See Appendix 19 in this document for a copy of their Pre-Publication Consultation Representation submission.</p>		<p>Comments noted. Support is welcomed.</p>

		Propert es Ltd												
389	70	James Togher, Environ ment Agency	Policy: LP 22 Sustainable Design and Construction		Yes	Yes							See also Publication Local Plan Comment ID 380 We support this policy to ensure new development is built to high environmental standards	Comments noted. Support is welcomed.
406	169	Brianne Stolper, Greater London Authorit y on behalf of Mayor of London	Policy: LP 22 Sustainable Design and Construction										The reference to achieving zero carbon standards in line with the London Plan for all major residential developments is welcomed. [See also Publication Local Plan Comment ID 40 for general/supporting comments made by the GLA on the Publication Local Plan, including references to previous correspondence]	Comments noted. Support is welcomed.
174	285	David Wilson, Savills, on behalf of Thames Water Utilities Ltd	Policy LP23 - Water Resources and Infrastructure Paragraphs 6.4.1 - 6.4.6	Yes	Yes	Yes							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. Paragraph 156 of the National Planning Policy Framework (NPPF) states:“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....” Paragraph 162 of the NPPF relates to infrastructure and states: “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.” The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306). 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.	Comments noted. Support is welcomed.

										Thames Water therefore supported 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. Thames Water similarly support the proposed new Policy LP 23 and its supporting text.		
390	70	James Togher, Environment Agency	Policy: LP 23 Water Resources and Infrastructure		Yes	Yes				See also Publication Local Plan Comment ID 380 We welcome this policy to improve water quality in line with the Water Framework Directive.		Comments noted. Support is welcomed.
279	264	Vicky Phillips, South West London Environment Network	paragraph 6.4.2 in Water quality		No				Yes	Water quality - protection of local rivers from outfalls which cause major pollution problems across London Borough of Richmond needs strengthening.	6.4.2 Remove the words "are encouraged to" and insert "must".	Comments noted. No changes required. Local Plan policies are unable to 'require' developments adjacent to rivers to improve the water quality of the rivers. However, the policy seeks to encourage the inclusion of measures to improve the water quality. This is also linked with Policy LP 21, which requires the use of Sustainable Drainage Systems in all development proposals. Also note that the Environment Agency is responsible for dealing with consents from outfalls and with water pollution incidents.

261	240	Caroline Wilberforce, Indigo Planning on behalf of Dawn Roads (Sharpe Refinery Service)	LP24 Waste Management Other: West London Waste Plan Policy WLWP 2 / Appendix 2	No	Yes	<p>Paragraph 182 of the National Planning Policy Framework (NPPF) requires that a Local Plan must be positively prepared, justified, effective and consistent with National policy.</p> <p>The allocation of Arlington Works under emerging Policy LP24 and the West London Waste Plan Policy WLWP 2 is not justified. The evidence base of the WLWP does not take into account the specialist nature of the oil recycling facility in this predominantly residential location in Twickenham.</p> <p>The current waste facility on site is noisy and unneighbourly. Frequent deliveries disrupt neighbours and negatively affect surrounding residential amenity (e.g. ongoing noise, odour, dust etc). The WLWP is designed to ensure that West London is self-sufficient in its ability to manage waste within the six boroughs that the plan covers. Arlington Works, as it is currently operates, does not service the overall waste function of the six boroughs in the WLWP. 93% of the oil that is recycled on site comes from outside of the plan area. There would be no measurable loss in service/capacity for waste oil recycling if Arlington Works is no longer identified in both emerging Policy LP24 or Policy WLPWP 2.</p> <p>It is on this basis that we request that Arlington Works is removed from Appendix 2 of the WLWP, therefore removing the waste policy on this site. This change would allow the Local Plan to be found sound.</p>	<p>Arlington Works should be removed from the list included within Appendix 2 of the West London Waste Plan. Refer to section 6 for further justification.</p>	<p>Comments noted. This is not a matter for this Local Plan as Arlington Works is listed within Appendix 2 of the adopted West London Waste Plan as Existing Waste Site in West London.</p> <p>The operator, Sharpe's Recycle Oil Ltd, has a permit issued by the Environment Agency to operate hazardous waste transfer at the Arlington Oil Facility, Arlington Works, a hazardous waste transfer station in Richmond upon Thames. In 2015 it handled 8445.671 tonnes of waste oils from around the country. Land for waste transfer, management and treatment in the West London Waste Plan area is severely limited. Therefore, existing sites are safeguarded for waste use through the London Plan and the adopted West London Waste Plan, and if, for any reason, an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved.</p> <p>London Plan Policy 5.17 states that Boroughs must allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the Plan. Boroughs may wish to collaborate by pooling their apportionment requirements. This is what Richmond Council has done through working collaboratively to prepare the joint West London Waste Plan. The West London Waste Plan (WLWP), adopted in 2015, plans for all waste in the West London Waste Plan area up to 2031. The Plan contains a policy to support site development and promote sustainable waste management. It does this by identifying suitable sites for development of new facilities and safeguarding all existing waste sites within west London, including sites listed within Appendix 2, which contains Arlington Works.</p>
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292	255	Tanja El Sanadidy, Indigo Planning Ltd on behalf of Shepherd Enterprises Ltd	Policy: LP 25 Development in Centres Proposals Map Changes Page: 12 Site name: High Street, Lower Teddington Road, Hampton Wick	No	No				Yes	<p>We are writing on behalf of our client, Shepherd Enterprises Limited, to make representation in respect of the Council's second consultation on the draft Local Plan (Publication). Shepherd Enterprises Limited is the owner of the land at 1D Becketts Place, Hampton Wick, KT1 4EW.</p> <p>We previously objected to the "<i>consultation on scope of review of policies and draft site allocations</i>" (letter dated 1 February 2016), and to the council's first consultation (letter dated 19 August 2017). We continue to express our objection to:</p> <ul style="list-style-type: none"> - Policy LP 36 (Affordable housing) and the requirement of a financial contribution on small sites; and - Site allocation policies LP 25 (Development Centres) and LP 41 (Offices). <p>The consultation form is included with this letter. We have set out our justification below.</p> <p>Policy LP 25 Development in Centres</p> <p>The site has been designated within the Hampton Wick's "Neighbourhood Centre". The Local Plan states that neighbourhood centres should provide shops and services for daily needs with key objectives to encourage a wider range of those to attract other uses of an appropriate scale. The Plan does not give reference of office uses within a Neighbourhood Centre. Therefore, this policy contradicts Policy LP 41 which considers the area to be a "Key Office Area".</p> <p>As mentioned above, our research results showed that the area is mainly in residential use with infrequent retail use and some office uses. We therefore consider that the area should not be allocated as a Neighbourhood Centre and should be recognised as a primarily residential area with a mix of other uses that support the area.</p>	<p>Policies LP 25 and LP 41 do not recognise the predominately residential use within the Hampton Wick area, especially the riverside frontage south of Kingston Bridge. These policies seek to protect an area that has changed significantly as is no longer an area with office use character. Therefore, we consider Policy LP 25 and LP 41 [See Publication Local Objective ID 291] should reflect the existing character of the area, and remove the designation as "Key Office Area" including the Article 4 Direction.</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 second consultation on the draft Local Plan (Publication).</p> <p>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>	<p>Comments noted. The Article 4 Direction (office to residential) is already in place and cannot be amended through the Local Plan process. Note that the Secretary of State did not intervene and thus has accepted that the amount and quality of office stock in this area warrants the removal of permitted development rights. The purpose of the Key Office Area designation is to allow the Council to apply specific planning policies and criteria in those areas should a proposal affect an existing office. In addition, the Key Office Areas have been identified as areas/clusters where new office provision, i.e. a net increase, is sought as part of development proposals.</p> <p>On the separate issue of the AMU boundary, the AMU and Key Office Area boundaries are not identical. The AMU boundary includes a larger area encompassing more of Hampton Wick High Street. Hampton Wick is a mixed use area which contains a range of commercial land uses including retail and office. There is no conflict with the policy for development in centres (LP25). In subsection C policy LP 26 lists uses suitable in neighbourhood centres, which includes 'business and employment developments.' It is considered appropriate to retain Hampton Wick's classification in the centre hierarchy as a neighbourhood centre, due to its size (approximately 50 commercial units), and role in providing for borough residents. No changes required.</p>
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412	73	James Cogan, GL Hearn on behalf of Evergreen Investment Retail Company	Policy: LP 25 Development in Centres		Yes						<p>See also Publication Local Plan Comment ID 409 - for preamble and introductory text to this representation</p> <p>Policy LP 25 - Development in Centres</p> <p>3.16 Our client's site at 3-33 King Street, Twickenham falls within the Twickenham Town Centre as defined by the Council's Proposals Map. Our client therefore welcomes Policy LP 25 of the Richmond Local Plan which acknowledges that the important role that Twickenham Town Centre performs within the borough and that focuses new development within existing centres such as Twickenham Town Centre.</p> <p>3.17 It is therefore concluded that Policy LP 25 is fully consistent with the Council's 'Strategic Vision' and 'Strategic Objectives', as well as the overarching objectives of the NPPF and London Plan (2016) which seek to promote sustainable development through focusing development towards existing centres.</p>		Support welcomed. No changes required.
229	225	Sally Arnold, Planning Potential Ltd on behalf of Power Leisure Bookmakers Ltd	Policy: LP 26 Retail Frontages (Section B) Page: 95 Paragraph Number: 7.2.7	Yes	No	Yes			Yes	<p>Although we welcome part (c) of the policy, we still consider that part (b) should specifically mention Sui Generis uses. The supporting text in 7.2.7 should be translated into policy. Changes should be made to the policy to reflect our client's comments in order for the policy to be classed as 'Sound'.</p> <p>See Appendix 17 in this document for a covering letter and appendix attached to this representation.</p>	Ensure that the Policy and text at paragraph 7.2.7 are aligned.	Comments noted. It is considered that Subsection (c) is appropriate and would not exclude a betting shop. Indeed, with the further detail provided in paragraph 7.2.7, there is sufficient clarity on which type of commercial and community uses are acceptable in secondary shopping frontages. The policy is designed to be used to be applied to a wide range of land uses, not specifically betting shops, or indeed the diverse sui generis use class, which includes uses such as scrap yards, which would not be appropriate in a secondary shopping frontage.	

228	225	Sally Arnold, Planning Potential Ltd on behalf of Power Leisure Bookmakers Ltd	Policy: LP 26 Retail Frontages (Section A) Page: 95 Paragraph Number: 7.2.5	Yes	No	Yes			Yes	<p>Change of use from A1 uses to other uses in Key Shopping Frontages should be acceptable, and putting a moratorium on non-A1 uses would be contrary to the NPPF. In addition, there is still disparity between the policy and the supporting text (paragraph 7.2.5). The supporting text provides clarity on non-A1 uses, but our client considers that the policy wording should be more explicit in noting that a proposal for the change of use from an existing non-A1 use to another appropriate use will be generally acceptable. Changes should be made to the policy to reflect our client's comments in order for the policy to be classed as 'Sound'.</p> <p><i>See Appendix 17 in this document for a covering letter and appendix attached to this representation.</i></p>	<p>Ensure that appropriate town centre uses are able to locate within key frontages (whether A1 or non-A1). Ensure that the Policy and text at paragraph 7.2.5 are aligned.</p>	<p>Comments noted. The Richmond Retail Study provides evidence of need for additional retail floorspace over the plan period. The borough has relatively healthy centres and few sites available for additional retail provision. The amount of key shopping frontage is carefully defined and is crucial to ensure that there is adequate retail provision to meet needs. Key shopping frontage policy works in tandem with secondary frontage where greater diversification is appropriate and where there is greater scope for change of use from retail. The latter is the appropriate place for complementary uses, albeit that their contribution to the health and offer of centres is acknowledged. Paragraph 23 of the NPPF allows for local authorities to designate primary (key) and secondary frontages and for policies to set out which uses will be permitted in these frontages. It is considered that this long standing and successful policy is both in line with the NPPF and appropriate for the characteristics of the borough. In addition, there remains scope for non-A1 uses in key frontages where the lawful use is an existing non-shop use. There is further scope for diversification in locations outside of designated frontages in centres. It is considered that the policy and supporting text are in alignment. The primary thrust of the policy is to resist the loss of A1 floorspace in key shopping frontages. Where there is no such loss, the policy will not be applied. The supporting text provides additional clarity on implementation for applicants where the proposal is for a change of use from an existing non-shop use. No changes required.</p>
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230	225	Sally Arnold, Planning Potential Ltd on behalf of Power Leisure Bookmakers Ltd	Policy: LP 26 Retail Frontages (Section C) Page: 96	Yes	No	Yes			Yes	<p>It is clear that the Council is seeking to resist an over-concentration of uses (especially betting shops) within any one area. However, there is no background information produced by the Council to suggest that there is an over-concentration in the first place (in fact, quite the opposite).</p> <p>See Appendix 17 in this document for a covering letter and appendix attached to this representation.</p>	<p>At present, the Policy is Unsound as it is not 'Consistent with National Policy' or 'Justified' as it is not presenting the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence. We suggest that this part of the policy is re-worded, and the reference to 'Betting Shops' is removed.</p>	<p>Comments noted. No changes required. The policy seeks to avoid concentrations of any uses, not specifically betting shops. The list of examples included in the policy, which includes betting offices amongst others, is not exhaustive. The inclusion of this use is merely as an example.</p>
231	225	Sally Arnold, Planning Potential Ltd on behalf of Power Leisure Bookmakers Ltd	Policy: LP 26 Retail Frontages (Section F) Page: 97	Yes	No	Yes			Yes	<p>In our client's opinion, Section F places an additional and unnecessary burden on betting shop operators (on top of the fact that betting shops now always require applications as they fall within the Sui Generis use category). This is against the aspirations of the London Plan and is not 'Consistent with National Policy'.</p> <p>See Appendix 17 in this document for a covering letter and appendix attached to this representation.</p>	<p>We suggest that Parts A, B and C of LP 26 are adjusted according to our comments to make clear that Sui Generis uses such as Betting Shops are supported by policy.</p>	<p>Comments noted. No changes required as it is considered that the requirements for marketing as set out in section F and Appendix 5 are reasonable and appropriate. The aim of Appendix 5 – Marketing is to provide clarity for applicants. Policy makes it clear that such evidence will only be required where a proposal for change of use is not supported by policy. It would therefore not be required in every case.</p>

272	178	Mark Underwood, Deloitte Real Estate on behalf of Metro Bank PLC	Policy LP 26 Retail Frontages Page: 95 Paragraph: 7.2	No	Yes	Yes	Yes	<p>[REPRESENTATION INCLUDES APPENDIX]</p> <p>On behalf of Metro Bank, I write in response to London Borough of Richmond upon Thames' (LBR) public consultation on the Local Plan. Metro Bank, as Britain's first new retail bank in over 100 years, is opening stores across the South East, and has identified Richmond as a target location.</p> <p>Metro Bank may at first appear to be similar to any other bank in terms of its services and offering. However, it is in the very clearly differentiated retail banking concept that sets it apart from its competitors.</p> <p>Metro Bank floated on the stock market in March 2016 and joined the FTSE 250 in June. This achievement demonstrates the growth of the business as the UK's leading challenger bank. I have appended a further summary of Metro Bank in Appendix A.</p> <p>Local Plan response</p> <p>The proposed Local Plan, namely Policy LP 26, requires that proposals which result in a loss of Use Class A1 floorspace in Key Shopping Frontages are resisted. Metro Bank considers that this approach is unsound as it is inconsistent with national policy, that it has not been adequately justified, nor been positively prepared.</p> <p>LBR's proposed policy approach, when combined with the Article 4 Direction restricted the change of use from A1 (Shop) to A2 (Financial and Professional Services) within the General Permitted Development Order 2015 (As Amended), is particularly concerning as it will become overly restrictive and contrary to national guidance.</p> <p>The broad brush approach of Policy LP 26 to require that an A1 unit must be demonstrated as unviable through long-term vacancy and reasonable attempts to let, is contrary to the objectives of paragraph 23 of the NPPF.</p> <p>Paragraph 23 of the NPPF states that Local Planning Authorities should promote competitive centres, provide customer choice and a diverse retail offer which reflects the individuality of centres. Customers expect more from their shopping experiences and there is pressure on centres to reinvent and respond to this expectation. The NPPF also attaches significant weight to supporting economic growth through the planning system, noting that investment should not be overburdened by the combined requirements of planning policy</p>	<p>Recommendation</p> <p>Accordingly, Metro Bank propose that LBR move towards a more progressive planning policy position in respect of the acceptability of banks and building societies in Key Shopping Frontages, recognising their contribution to the vitality and viability of the high street, as national government has done.</p> <p>In order to be considered sound, and to conform to national legislation, it is proposed that Policy LP 26 incorporates explicit reference to the positive contribution that banks and building societies can make to the high street. Such wording could include:</p> <p>"Key Shopping Frontages:</p> <p>A. Proposals that result in a loss of floorspace in Use Class A1 in Key Shopping Frontages will be resisted. Other uses converting to retail will be supported, subject to there being no adverse impact on the centre. The Council will seek to retail key facilities including Post Offices, and will encourage Banks and Building Societies which contribute positively to the vitality and viability of the centre."</p>	<p>Comments noted. No changes required. The Richmond Retail Study provides evidence of need for additional retail floorspace over the plan period. The borough has relatively healthy centres and few sites available for additional retail provision. The amount of key shopping frontage is carefully defined and is crucial to ensure that there is adequate retail provision to meet needs. Key shopping frontage policy works in tandem with secondary frontage where greater diversification is appropriate and where there is greater scope for change of use from retail to other suitable uses, for example banks and building societies. The Council recognises that banks and building societies offer a useful service to the public and their contribution to the health and offer of centres is acknowledged. Secondary shopping frontages are mostly defined in locations adjacent to key shopping frontages and are therefore attractive locations for a range of businesses. There remains scope for non-A1 uses in key frontages where the lawful use is an existing non-shop use. There is further scope for diversification in locations outside of designated frontages in centres. Paragraph 23 of the NPPF allows for local authorities to designate primary (key) and secondary frontages and for policies to set out which uses will be permitted in these frontages. It is considered that this policy successfully achieves this and is both in line with the NPPF and appropriate for the characteristics of the borough. The policy is therefore not in conflict with paragraph 23 of the NPPF in relation to customer choice and diversity of offer, which are encouraged through policy LP 26, which allows for retail to predominate in key frontages and steers new complementary uses into secondary frontages. The Article 4 Direction introduced to restrict change of use from A1 to A2 came into force in April 2017; the</p>
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expectations and that centres should be resilient to anticipated future economic changes. In respect of Class A2 uses, this was born out by the General Permitted Development Order change introduced from 6 April 2014 to enable flexibility between A1 and A2 uses.

The NPPF seeks to ensure the vitality of town centres, stating that planning policies should be positive and promote competitive town centre environments. Structural changes in high street planning policy and the banking sector have actively sought to promote the ability for banks to be a fundamental part of the high street offer, recognising they have a key role to play in ensuring the vitality of the high street.

The amendments to permitted development rights in 2014 to enable the change of use from A1 to A2, were a direct result of this approach and recognised banking as an essential high street service. Alongside visits to the chemist, post office and food stores, banks are a cornerstone of the high street.

High street banks are now driven by their public interface and provision of a valuable service to visiting members of the public. The very nature of a customer facing use and essential service is what continues to drive footfall to these units. Shops provide a service to customers and so do banks. The appeal of a bank in driving footfall is that it is destination led and can often be the reason for the customer to visit the high street in the first place, with linked trips providing knock-on benefits for other retailers.

As an essential high street service, and in response to changes to the banking sector, the look and feel of banks on the high street has changed. The role of an austere, impenetrable and inward facing building has diminished, replaced by fully glazed, well lit, modern shopfronts such as Barclays, Metro Bank and TSB in a spin off from Lloyds as the high street retail bank.

Today's banking model is also operating in a similar manner to modern retail, lifestyle and leisure uses in town centres; in that long hours, customer engagement and experience via store and multi-platforms are core to the operation of a retail bank.

Secretary of State did not intervene and accepted the evidence presented by the Council. The Council undertook specific and robust research to justify its approach, which is published on the Council's website. The Article 4 Direction does not apply across the whole borough but to very specific areas within a limited number of centres.

232	225	Sally Arnold, Planning Potential Ltd on behalf of Power Leisure Bookmakers Ltd	Policy: LP 27 Local Shops and Services (Section A) Page: 99	Yes	No	Yes				Yes	<p>This policy is essentially restricting Sui Generis uses such as betting shops locating in areas where there is no key frontage or secondary frontage within 400 metres, which could effectively mean that betting shop operators cannot locate within many parts of the borough (particularly in the local centres, parades and AMUs such as Barnes, Kew, Mortlake, Whitton and Heathfield, Richmond and Richmond Hill, East Twickenham and St Margarets). This effectively means that betting shop operators are restricted from locating in many areas of the borough which again is against the spirit and aspirations of the NPPF.</p> <p>See Appendix 17 in this document for a covering letter and appendix attached to this representation.</p>	Further comments are set out in our letter. Re-word the policy to ensure that no viable town centre uses are discriminated against to ensure compliance with the NPPF.	Comments noted. No changes required. The aim of this policy is to protect local shopping and services in isolated locations, i.e. more than 400 metres from designated frontage. This would for example protect a corner shop that is more than 400 metres from designated shopping frontage where there are likely to be other shopping facilities available. In practice, there are relatively few areas in the borough (excluding unpopulated areas such as the Royal Parks, Kew Gardens etc), which are not within 400 metres of designated shopping frontages. It is therefore considered that this representor has misunderstood the policy as it would not apply to proposals in existing centres. Within centres, applications for betting shops would be acceptable if they are in line with existing policies such as LP 26. The purpose of Policy 27 is to ensure that residents have shops and A1 services within reasonable walking distance. In addition, part A of the policy applies to Use Classes A1 to A5 only.
296	101	Kevin Rice, Hampton Society Planning Sub group	8 Community Facilities								<p>We are also interested in the comments made about Community Facilities in Section 8 and comments that there must be sufficient capacity say for water and sewerage and for developments of 10+, the developer must demonstrate sufficient infrastructure.</p> <p>We have made enquiries of Thames Water on these matters and been told that there is a potential problem if there were over 50 units added into the drainage system which runs along Station Road and the High Street. With the various proposed developments including the Hampton Traffic Unit we believe this threshold will be exceeded. However there is no mention of this area in the Infrastructure Delivery Plan or the Infrastructure Delivery Schedule, have these been updated since 2012?</p>		Comments noted. No changes required. The Infrastructure Delivery Plan was updated in April 2017 and provides a key evidence base for the Local Plan. In terms of capacity for water and sewerage, it is considered that such infrastructure requirements are adequately addressed in Policy LP 23, which ensures that there is adequate water supply, surface water, foul water drainage and sewage treatment capacity to serve a development, or that extra capacity can be provided in time to serve the development, prior to new development being permitted. Also note that Thames Water support policy LP 23 and consider this sufficient.

1	286	Ross Anthony , Theatres Trust	Policy LP28 Social and Community Infrastructure	Yes	Yes	Yes					The Theatres Trust supports policy LP28 as it reflects the NPPF and the London Plan. The National Planning Policy Framework (NPPF) 2012, which guides spatial planning and decision making in England, provides clear directions to local planning authorities about the importance of safeguarding and promoting culture activities and venues in their areas. Paragraph 70 states that in 'promoting healthy communities', planning decisions should 'plan positively for cultural buildings' and 'guard against the loss of cultural facilities and services.' Paragraph 156 directs local planning authorities to ensure their local plan includes cultural policies that reflect the NPPF. In addition, Policy 4.6 of the London Plan 20 sets out the requirement for local plans's to support and enhance cultural activities and venues across London.		Support welcomed. No changes required.
396	266	Dale Greetham, Sport England	8 Community Facilities - 8.1 Social and Community Infrastructure - Policy LP 28		No					Yes	Please see Sport England's comments are previously submitted. These remain relevant and valid. Please see Appendix 21 in this document for a PDF version of the comments referenced above.		Comments noted. Indoor sports facilities are referenced in paragraph 8.4.20, which states that they are covered by LP28 in 8.1 'Social and Community Infrastructure'. No changes required.
18	125	Rachel Hughes	8 Community Facilities Paragraph 8.1.1 SA 7 Strathmore Centre, Strathmore Road, Teddington	Yes	Yes	No					There has been insufficient consultation with Stanley AM PM Project Ltd, in relation to the future provisioning of pre / post school childcare facilities on site SA7, which are critical to the ability of parents from Twickenham and Teddington to be able to work. The consultations thus far have not provided any clarity that teh council recognises the importance of this social and community infrastructure, and the need to maintain this. Adequate consultation also needs to take place with transitioning of provision in any possible development of site SA7, so that provisioning of the child care can be continued for the duration of any site development and beyond	Consultation with the management of Stanley AM PM Project Ltd, and a firm commitment to reprovisioning facilities at the current site.	Comments noted. It is considered that the broad approach to SA 7 is sufficiently detailed about the nature and scale of development, in line with national planning guidance. The important contribution that the child-care services provide at this location is recognised. Policy SA 7 states that proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way (which is intended to refer to reprovision 'on this site') or elsewhere in a convenient alternative location accessible to the current community it supports. This policy approach is also consistent with Policy LP28.C. It should be noted that this is a Council owned site and relevant Council officers are liaising and engaging with the current nursery provider to explore the options for this site. No changes required.

286	26	Mathew Mainwaring, Indigo Planning on behalf of Beechcroft Developments Ltd	Policy: LP 28 Social and Community Infrastructure Paragraph: 8.1.2 Page 103	No			Yes	Yes	Yes	<p>Draft Policy LP 28: Social and Community Infrastructure – Supporting paragraph 8.1.2</p> <p>As raised in our representations to the Pre-Publication Local Plan, supporting paragraph 8.1.2 to Policy LP 28 identifies that the Council will determine, as part of the pre-application process, whether any facility or service is considered to be a social infrastructure or community use. This is at odds with paragraph 154 of the NPPF which states that “only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan”.</p> <p>In response to our previous representations regarding paragraph 8.1.2 of the Pre-Publication Local Plan, the Council suggested that ‘each application will be assessed on its own merits’, however, paragraph 8.1.2 indicates that this assessment will take place at the pre-application stage. Paragraph 8.1.2 therefore lacks the clarity required to guide potential developers in the Borough.</p> <p>It suggests a necessity for pre-application discussions with the Council, which the NPPF states, at paragraph 189, cannot be required of a developer by a local planning authority prior to the submission of a planning application.</p>	<p>If the Council consider it important to protect such social and community infrastructure uses, it should at the very least have a clear and identified schedule of such uses worthy of protection based on a strong evidence based assessment. Paragraph 8.1.2 should therefore be amended to reflect this and indicate that the Council will undertake an evidence based assessment to establish any social and community infrastructure uses worthy of protection.</p> <p>Paragraph 8.1.2 should be amended to be consistent with the NPPF and provide potential developers with clearer guidance.</p>	<p>Comments noted. Policy LP28 explains that ‘need’ is identified on an evidential basis from the Council’s and partner’s strategies, such as the Council’s Infrastructure Delivery Plan. Paragraph 8.1.2 is a non-exhaustive list of the types of facilities and services that the Council considers to be social and community infrastructure facilities. Each application will be assessed on its own merits. It is the choice of an applicant/developer to enter into pre-application discussions; it is considered that this accords with national planning guidance that states early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties and states that local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. No changes required.</p>
254	69	Samantha Powell, Education Funding Agency	Richmond Local Plan Proposed Policies and Provision of Schools							<p>The EFA welcomes the support within the LB Richmond Local Plan to schools as necessary infrastructure required to help deliver sustainable growth in the borough. The EFA note the London Plan target of 315 dwellings per annum to be provided in the borough for the period 2015-2025. This will place some additional pressure on social infrastructure such as education facilities.</p> <p>The EFA supports reference within the Local Plan (at 18A) to the promotion and provision of schools of sufficient quality and quantity in the borough. Text within 18B and new Policy LP 29 ‘Education and Training’ are also supported, confirming that land in education use will be safeguarded; new sites for schools will be allocated in the Sites Allocation DPD; the potential of existing school sites will be maximised through redevelopment, refurbishment or re-use to meet education needs; and that the Council will encourage flexible and adaptable buildings, multi-use and co-location with other social infrastructure to help meet this need.</p> <p>In light of the above, the EFA encourages local authorities to work closely with us during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Reference within section 8.2 (Education) to the existing working relationship with EFA to help provide the quantity and diversity of school places needed and to identify possible sites for new schools and, where appropriate, to indicate its support for free school proposals, is welcomed. In line with the Duty</p>	<p>In this respect, the EFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD) (https://www.ealing.gov.uk/info/201164/local_plans/1961/planning_for_schools_dpd). The DPD provides policy direction and establishes the Council’s approach to providing primary and secondary school places and helps to identify sites which may be suitable for providing them (including on Green Belt/MOL), whether by extension to existing schools or on new sites. The DPD includes site allocations as well as policies to safeguard the sites and assist implementation, and was adopted in May 2016 as part of the Local Plan. The DPD may provide useful guidance with respect to securing site allocations for schools in your emerging DPD, as well as providing example policies to aid their delivery through your Development Management policies.</p>	<p>Support welcomed. The EFA is one of the statutory consultees in the Local Plan database kept informed of plan-making. No changes required.</p>

											to Cooperate, please add the EFA to your list of relevant organisations with which you engage in preparation of the plan.		
282	105	Helena Taylor, Lichfields on behalf of The Harrodian School	LP 29	Yes	Yes	Yes					<p>Policy LP29 encourages the provision of facilities and services for education and training of all age groups to help reduce inequalities and support the local economy, by, amongst other things, encouraging the potential to maximise existing educational sites through extensions, redevelopment or refurbishment to meet identified educational needs.</p> <p>The School must ensure it continues to develop and enhance its facilities to meet the demand of current and future students. The NPPF places great importance on ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities and recognises that Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement. By making the most efficient and sustainable use of a previously developed site such as The Harrodian School, this would reduce the need to provide for alternative facilities in new locations.</p> <p>Policy LP29 is positively prepared, justified, effective and consistent with national policy and is therefore sound. The School supports this policy.</p> <p><i>See also Publication Local Plan Proposals Map Changes ID Comment 82 for additional background information.</i></p>	<p>The Harrodian School continues to support both the proposed alteration of the MOL boundary in the Local Plan Proposals Map Change document and draft Local Plan Policy LP29 (Education and Training).</p> <p>Policy LP29 and the Local Plan Proposals Map Change are both positively prepared, justified, effective and consistent with national policy, and are therefore sound.</p>	Support welcomed. No changes required.

310	189	Shaun Lamplough, Mortlake with East Sheen Society	8. Community Facilities Policy LP29: Education and Training Page 107 para 8.2.11								<p>MESS comments on Pre-Publication Local Plan, August 2016 - Do not support proposal for additional school places in the Mortlake / East Sheen area, particularly proposals on the Stag Brewery or Barnes Hospital site because access to both sites is poor by both public transport and car.</p> <p>Council's response to MESS comments, January 2017 - The Council's School Place Planning Strategy 2015-24 indicates need for school provision in the Barnes / Mortlake and Barnes Common area (Area 9). Given the difficulty in finding appropriate / available development sites in the borough, including for new schools, any accessibility issues will need to be addressed as part of planning applications, including through the use of Travel Plans. This should be achievable to enable the Council to provide school places on the Stag Brewery site and Barnes Hospital site in order to meet local need. Travel Plans and Transport Assessment will therefore be required to mitigate any potential harmful impacts on local amenity and congestions.</p> <p>MESS comments on Publication Local Plan, February 2017 - MESS strongly believes that potential harmful impacts can not be mitigated.</p> <p>MESS comments on Pre-Publication Local Plan, August 2016 - Map of existing schools should be provided in the Education and Training section of the Plan.</p> <p>Council's response to MESS comments, January 2017 - Map of schools will be included within the forthcoming updated Infrastructure Delivery Plan.</p> <p>MESS comments on Publication Local Plan, February 2017 - Policies about the provision of more secondary schools need to be accompanied by an appropriate map in the Publication Local Plan. A map does exist (it is in the Health and Wellbeing section) and it just needs to be tailored for the Education and Training section.</p>		<p>Comments on the Publication Local Plan noted. Paragraph 8.2.11 sets out the sites that have been identified for education uses as part of the Local Plan. It should be noted that the Infrastructure Delivery Plan was updated in April 2017, which sets out the existing and future requirements for schools provision in the borough.</p> <p>With regard to the map in the Health and Wellbeing section on the Plan, it should be noted that this is to serve a specific purpose for policy implementation, i.e. the map shows the restriction zones for fast food takeaways. No changes required.</p>
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318	151	Rebecca Doull, GVA on behalf of Lady Eleanor Holles School	Policy LP29: Education and Training Our previous representations have set out the need for expanding the school, in the context of a planning policy framework that supports the provision of new education facilities and seeks to maximise the potential of existing education sites.	No	Yes				<p>Lady Eleanor Holles School wish to expand to provide spaces for children aged 4-7 years i.e.to construct a new pre-prep school.(in addition to the existing 180 pupil, junior school and 680 pupil senior school.) MOL currently is designated across the majority of the approx 9.87 ha site.</p> <p>The Publication version of the Local Plan does not fully address the education needs of the Borough, nor does it consider the realignment of MOL boundaries for the provision of education facilities where exceptional circumstances have been demonstrated. Therefore, we do not consider the plan currently complies with the NPPF and urge the Council to reconsider our previous representations to amend the Plan accordingly to appropriately plan for the identified education needs of Lady Eleanor Holles School.</p>	<p>The National Planning Policy Framework (NPPF) requires that Local Plans plan positively for the development and infrastructure required in each local authority area, and that new land is brought forward where necessary. In order to plan positively for the education needs of the Borough, the Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.</p> <p>Our previous representations have set out the need for expanding the school, in the context of a planning policy framework that supports the provision of new education facilities and seeks to maximise the potential of existing education sites.</p> <p>In accordance with the NPPF, which advocates a plan-led approach and places great emphasis on the need for local planning authorities to have up-to-date plans in place, the Local Plan should be based on up-to-date evidence about the capacity of existing infrastructure and future need. The evidence-gathering and assessment of education need is something that should be undertaken now, as part of the Local Plan process, rather than at the planning application stage.</p> <p>In addition to objectively assessing infrastructure requirements, the Local Plan must address the release of MOL on school sites to accommodate the provision of new education facilities where there is an identified need and the development potential of land not designated as MOL has been optimised. In accordance with an NPPF-compliant plan-led approach, this should be considered through the Local Plan process, not on the basis of speculative planning applications. <i>(See Appendix (9) to this document for previous representations Supporting Statement)</i></p>	<p>Comments noted. No changes required as it is considered that the Local Plan fully plans for and addresses the education needs of the borough. It is based upon the Council's School Place Planning Strategy, which is regularly reviewed and updated. In addition, the Council's Infrastructure Delivery Plan, last updated in April 2017, considers in detail the existing infrastructure and future needs, also in relation to education provision.</p> <p>The Local Plan's Spatial Strategy states that the borough's parks and open spaces provide a green lung for south/west London. In addition, there is a presumption against the loss of, or building on, greenfield sites as well as MOL/Green Belt in this borough, unless very special circumstances and/or an exception to relevant policies can be demonstrated. In addition, the Plan demonstrates that the Borough can meet its housing needs without releasing open land that is protected by designations such as Green Belt or MOL. Therefore, a borough-wide Green Belt or MOL review has not been undertaken as part of this Local Plan.</p> <p>Also see the Officer response under Comment ID 321 above in relation to the specific request to review and amend the MOL boundary for Lady Eleanor Holles School.</p>
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42	213	Stephanie Pembrton	Pages 107 Paragraph 8.2.11	No	No	No	Yes	Yes	Yes	Yes	See comment ID 40 on Publication Local Plan.	<p>Suggested amended text 8.2.11</p> <p>Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan:</p> <p>Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college</p> <p>Stag Brewery, Mortlake: provision of a new 2-form of entry primary school</p> <p>Ryde House, East Twickenham: provision of a new 2-form of entry primary school</p> <p>Barnes Hospital, Barnes: provision of 2-form of entry primary school</p>	<p>Comments noted. National planning policy and guidance sets out 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. Richmond Council has a statutory duty, under Section 14 of the Education Act 1996, to ensure a sufficiency and diversity of state-funded school places within its administrative area for children of compulsory school age.</p> <p>The Council considers that Policy LP 29 as well as Policy SA 24 Stag Brewery are based on robust evidence, including the Council's School Place Planning Strategy. The responsibilities and duties in relation to education and children's services are provided by the Community Interest Company 'Achieving for Children', which is shared with Kingston Council, and who undertake regular forecasts on behalf of the Council of the numbers of children who will need school places in the borough. Unless a new secondary school can be provided in the east of the borough, the Council would be unable to meet its statutory duty to provide places for those children. It is forecast that the children who are at most risk of not being admitted to any of the three schools in the eastern half of the borough live in Kew, and east and north Barnes. The updated School Place Planning Strategy (2015) therefore identifies the Stag Brewery site for a six-form entry secondary school, which would grow year-group by year-group over seven years. There would be 900 pupils in total across Years 7-11, with an eventual sixth form of 250.</p> <p>A number of alternative sites for a secondary school were considered.</p> <p>The assessment of alternative sites included (1) Barn Elms Playing Fields, Barnes, (2) London Welsh RFC Ground, Old Deer Park, Richmond, (3) London Scottish & Richmond RFC Grounds, Richmond Athletic Ground, Richmond and (4) Pools on the Park, Old Deer Park,</p>
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46	250	Ella Sanders Smith	Pages 107 Paragraph 8.2.11	No	No	No		Yes	Yes	Yes	<i>See comment ID 45 on Publication Local Plan.</i>	Suggested amended text 8.2.11 Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan: Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form of entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school	See Officer response to Comment ID 42 above.
131	11	Anthony Atkinson	Publication Local Plan Page 107 Paragraph 8.2.11	No	No	No	Yes	Yes	Yes	Yes	Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction. endorse the views expressed by Mortlake Brewery Community Group in its representation(s).]	Suggested amended text 8.2.11 Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan: Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form of entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school	See Officer response to Comment ID 42 above.
143	135	Alistair Johnstone	Publication Local Plan Page 107 Paragraph 8.2.11	No	No	No	Yes	Yes	Yes	Yes	Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction. I endorse the views expressed by Mortlake Brewery Community Group in its representations In addition, I would emphasise that the density of the proposed Brewery development is crazy... the Brewery site should be used for a Secondary School OR a housing development, not both... the traffic and transportation issues of both will cause a Perfect Storm of congestion and overcrowded public transportation in this already very busy part of the Borough... I would also like to take issue with the loss of the "Green Corridor" to the river which was a key component of the 2011 development plan... this would make a huge difference to the Mortlake area and it would be a tragedy if the one in a lifetime chance to create this great public amenity was lost...	8.2.11 Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan: - Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college - Stag Brewery, Mortlake: provision of a new 2-form of entry primary school - Ryde House, East Twickenham: provision of a new 2-form of entry primary school - Barnes Hospital, Barnes: provision of 2-form of entry primary school	See Officer response to Comment ID 42 above. In addition, it should be noted that Other Open Land of Townscape Importance (OOLTI) has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. The OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances.

162	281	Stephen & Margaret Tester	Publication Local Plan Page 107 Paragraph 8.2.11	No	No	No	Yes	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.</p> <p>My wife, Margaret Tester, who lives with me at the above address, endorse the views expressed by Mortlake Brewery Community Group in its representation(s).]</p> <p>We feel particularly strongly that the proposed secondary school is too small for the site, and that any decision to build it in this location would be misguided, given the availability of ample land at Barn Elms for such a development.</p> <p>The introduction of a 1000 pupil school, accessed from the already congested Lower Richmond Road, coupled with a 1000 unit residential estate is going to create huge traffic problems which are not alleviated in any significant way by the current proposals. The end result will be a heighthened level of pollution, an enhanced risk of asthma and similar problems and an overall reduction in the quality of life in the area.</p>	<p>8.2.11 Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan:</p> <ul style="list-style-type: none"> - Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college - Stag Brewery, Mortlake: provision of a new 2-form of entry primary school - Ryde House, East Twickenham: provision of a new 2-form of entry primary school - Barnes Hospital, Barnes: provision of 2-form of entry primary school 	<p>See Officer response to Comment ID 42 above.</p> <p>In addition, it should be noted that Other Open Land of Townscape Importance (OOLTI) has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. The OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances. However, it should be noted that any such reprovision would have to be on this site and not off-site or elsewhere in the Mortlake area.</p> <p>To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "<u>Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. <i>This includes the retention and/or reprovision and upgrading of the playing field within the site.</i></u>"</p> <p>It is considered that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. Policies need to be sufficiently flexible, for example to take account of changing market conditions, as well as deliverable, and therefore they should not be too</p>
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6. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and nutritional quality of food. It also fails to reflect the fact that food of various nutritional quality is available at restaurants, pubs and, simply, shops (including coffee shops and bakeries) as well as hot food takeaways.

7. The overall approach is based on reducing rather than widening choice in the purchase and consumption of food and will reduce accessibility for all people living in the areas affected, reducing the viability of local parades of shops and creating unsustainable travel incentives.

8. Diet is clearly a key determinant both of general health and obesity. Exercise is the other key determinant, which must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more positive strategy.

JUSTIFIED

1. No reasoned justification has been provided that sets an objective and explains how the draft policy will secure that objective. Supporting text at paragraphs 8.3.13 – 8.3.15 contains assertions and generalisations rather than any reference to the evidence base.

2. There is no objective evidence for any link between the incidence of obesity and the proximity of hot food takeaways to schools, so it is at best unclear whether an effort to achieve the objective stated based on refusing planning applications on this basis could ever work.

3. A further difficulty of using distance radii is that it takes no account of real barriers, either physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away.

EFFECTIVE

1. Some hot food takeaways, together with restaurants, pubs and shops are a source of cheap, energy dense and nutrient poor foods, however, not all are, and the planning system is ineffective in distinguishing those that are and those that are not.

2. Consequently, policies such as this effectively penalise operators of hot food takeaways who expend resources to engage with Government and other agencies to improve the nutritional value of their overall offer and to

food-environment/health-matters-obesity-and-the-food-environment--2
This recommends the use of planning policies to tackle obesity, such as by "ensuring development avoids over-concentration of hot food takeaways in existing town centres or high streets, and restricts their proximity to schools or other facilities for children and young people and families." It is therefore considered that new hot food takeaways within proximity to schools will have an adverse impact on the health and wellbeing of the local population and in addition they would undermine the local authority's strategy to tackle obesity.

The approach is also consistent with the objectives of NPPF. In particular, the NPPF seeks to use the planning system to promote strong, vibrant and healthy communities that reflect the community's needs and supports its health and well-being. The NPPF recognises that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. It states that Local Plans 'should take account of and support local strategies to improve health, social and cultural wellbeing for all'. It also provides clear advice that local planning authorities 'should work with public health leads and health organisations to understand and take account of the health status and needs of the local population... including expected future changes, and any information about relevant barriers to improving health and wellbeing'. The National Planning Practice Guidance also refers to promoting access to healthier food and that a health impact assessment may be a useful tool where significant impact is expected.

										<p>encourage healthier choices.</p> <p>3. It is difficult to see how the effectiveness of the extent of the exclusion zones could be monitored. Would poor or negative achievement against objective result in reduction or expansion of the zones? What corrective action might be taken short of its withdrawal?</p> <p>CONSISTENT WITH NATIONAL POLICY</p> <p>1. No regard has been had to national policy in preparing the draft policy because none of the NPPF policies include dietary issues and national practice guidance simply refers to a briefing paper that contains case studies. This does not represent consistency.</p> <p>2. The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating rather than restricting choice, by increasing access to health services and recreation, and by ensuring facilities are within walkable distance.</p>		
325	227	Jabed Rahman, Public Health, London Borough of Richmond	Policy LP 30 Health and Wellbeing Page: 108	Yes	Yes	Yes				<p>See also Publication Local Plan Comment ID 322</p>	<p>Page 108, Policy LP 30 (Health and Wellbeing)</p> <p>“Planning, at all levels, can play a crucial role in creating environments that enhance people’s health and wellbeing. The Council promotes and supports healthy and active lifestyles and measures to reduce health inequalities.</p> <p>A. The Council will support development that results in a pattern of land uses and facilities that encourage:</p> <ol style="list-style-type: none"> 1. Sustainable modes of travel such as safe cycling routes, attractive walking routes and easy access to public transport to reduce car dependency. 2. Access to green infrastructure, including river corridors, local open spaces as well as leisure, recreation and play facilities to encourage physical activity. 3. Access to local community facilities, services and shops which encourage opportunities for social interaction and active living, as well as contributing to dementia-friendly environments. 4. Access to local healthy food, for example, allotments and food growing spaces. 5. Access to toilet facilities which are open to all in major developments where appropriate (linked to the Council’s Community Toilet Scheme). 6. An inclusive development layout and public realm that considers the needs of all, including the older population and disabled people. 7. Active design which encourages wellbeing and greater physical movement as part of everyday routines (e.g. building layout which makes it convenient for people to take the stairs instead of just the lifts). 	<p>Agreed. Proposed minor change additional text under bullet point 6 of Policy LP 30 Health and Wellbeing (Page 108), to read as follows: <u>“7. Active Design which encourages wellbeing and greater physical movement as part of everyday routines.”</u></p>

326	227	Jabed Rahman , Public Health, London Borough of Richmond	Policy LP 30 Health and Wellbeing Paragraph: 8.3.2 Page: 108	Yes	Yes	Yes					See also Publication Local Plan Comment ID 322	Page 108, Healthy Lifestyles “8.3.2 The environment in which we live is a key determinant in people's health and wellbeing. The planning system plays an important role in influencing the built and natural environment and therefore plays a key role in the physical and mental wellbeing of the population. A healthy environment can promote <u>wellbeing and</u> healthy lifestyles for all and can contribute to a reduction in health inequalities.”	Agreed. Proposed minor addition to paragraph 8.3.2 of the reasoned justification at Page 108 to read as follows: "The environment in which we live is a key determinant in people's health and wellbeing. The planning system plays an important role in influencing the built and natural environment and therefore plays a key role in the physical and mental wellbeing of the population. A healthy environment can promote <u>wellbeing and</u> healthy lifestyles for all and can contribute to a reduction in health inequalities."
327	227	Jabed Rahman , Public Health, London Borough of Richmond	Policy LP 30 Health and Wellbeing Paragraph: 8.3.4 Page: 109	Yes	Yes	Yes					See also Publication Local Plan Comment ID 322	“8.3.4 Planning can play a part in facilitating the creation of healthy environments. Development should result in a pattern of land uses and facilities <u>that positively impact on wellbeing and which encourages healthy choices by making them the most convenient</u> and attractive option for residents, helping them to lead healthier lives more easily.”	Comments noted. However, it is considered that paragraph 8.3.4 as currently worded provides a succinct summary of land use patterns to promote healthy lifestyle choices. No further changes required.
328	227	Jabed Rahman , Public Health, London Borough of Richmond	LP Policy 30 Health and Wellbeing Paragraph: 8.3.12 Page: 109	Yes	Yes	Yes					See also Publication Local Plan Comment ID 322	Page 109, Health Impact Assessment “8.3.12 A Health Impact Assessment (HIA) must be submitted with all major applications. A HIA should assess the health impacts of a development, identifying mitigation measures for any potential negative impacts as well as measures for enhancing any potential positive impacts. <u>It should consider and make links to other submitted documentation e.g. Design and Access Statement, Air Quality, Transport Assessment, Flood Risk Assessment.</u> ”	Comments noted. However, it is considered that the nature of HIAs means that consideration of other submitted documentation will be embedded into the HIA process. No further changes required.
218	239	Dean Jordan, DP9 on behalf of Richmond Athletic Association	Public Open Space, Play Space, Sport and Recreation LP 31									Policy LP 31 notes that the Council will protect and where possible enhance public open space, play space, sport and recreation. It goes on to note that improvements of existing facilities and spaces, including their openness and character and their accessibility and linkage will be encouraged. The Council has identified through the publication of their Playing Pitch Strategy and Indoor Sports Facilities Needs Assessment that the Borough has an outstanding need and gap in their current provision. Policy LP 31 should not only protect the current facilities but should also seek to enhance the existing facilities and promote the creation of new facilities to meet current day and future demand. There should be an acknowledgement within the policy that supports complimentary development to enable the creation of new or improved sporting facilities. This should	Comments noted. It is considered that the enhancement of existing facilities and support for new provision is adequately addressed in Policy LP 31 and its supporting text, and supported by reference to the Playing Pitch Strategy. In particular, in relation to playing pitch provision, please note both paragraphs 8.4.2 and 8.4.18. The former states "The Council has produced assessments of need for open space (including play space), sports and recreation facilities, including opportunities for new provision, as well as borough-wide Playing Pitch Strategy. These, together with the site-specific open space and

be strongly supported by the Council.

play space needs assessments for major development, will provide the starting point for assessing any proposals that could lead to a loss of, or could impact on, existing facilities", and the latter states "Where a proposal involves the loss, or impact on the size or quality, of a playing pitch, the applicant has to submit a full assessment demonstrating how the relevant guidance, policies and criteria have been addressed. There is also an expectation that overall the development will deliver an increase and enhancement of sports facilities, provision of wider public benefits, including public access, and therefore enabling and promoting physical activity and encouraging healthier lifestyles and habits for all ages."

However, it would be inappropriate to refer to 'complementary' development or 'enabling' facilities within the planning policy as any such additional, potential non-sporting facilities, would need to be considered and assessed on a site by site basis as part of the development management process. It should be noted that the site allocations within the Plan that relate to existing sites for sporting uses, such as SA 10, SA 11, SA 22 and SA 24, refer to complementary uses; however, the policies make clear that these would need to provide for identified needs and they would not allow to detract from the main sporting use of the site.

397	266	Dale Greetham, Sport England	8.4 Public Open Space, Play Space, Sport and Recreation	No					Yes	<p>Please see Sport England's comments are previously submitted. These remain relevant and valid.</p> <p><i>Please see Appendix 21 in this document for a PDF version of the comments referenced above.</i></p>	<p>It is noted that Sport England would like to see specific references to indoor and outdoor sport facilities. Indoor sports facilities are referenced in Policy LP 28, paragraph 8.1.2, and there is a cross-reference within Policy LP 31, paragraph 8.4.20, which states that they are covered by LP28 in 8.1 'Social and Community Infrastructure'. It is therefore not considered necessary to further repeat or reference indoor facilities within Policy LP 31. It is considered that outdoor sport facilities are sufficiently covered in Policy LP 31, including within the main policy text as part of reference 'formal and informal land for sport and recreation' as well as paragraphs 8.4.16 to 8.4.19.</p> <p>In relation to Sport England's request regarding the Sport England Land Use Policy Statement and NPPF paragraph 74, it is not considered necessary to repeat within the Local Plan specific national guidance and policy. It is considered that the reference to the NPPF and Sport England Policy within paragraphs 8.4.17 and 8.4.18 is sufficient.</p> <p>It is also not considered appropriate to mention specific indoor and outdoor sport needs within the policies as these are set out and referred to within the Council's evidence base including the Playing Pitch Strategy, the Playing Pitch Strategy Assessment and the Indoor Sport Facilities Needs Assessment. In addition, the Council's Infrastructure Delivery Plan also highlights specific needs. No changes required.</p>
311	189	Shaun Lamplough, Mortlake with East Sheen Society	Policy LP31: Public Open Space, Play Space, Sport and Recreation Page 114, para 8.4.18							<p>It is noted that the Council will resist the loss of a playing field unless the proposal meets the exceptional circumstances test as set out in the Sport England policy. Such policy needs to be shown in a footnote or appendix or with a link to the Sport England website.</p>	<p>Comments noted. No change required as the Council has refrained from referring to guidance within specific footnotes or appendices throughout the Plan. This is to ensure the longevity of the Plan and to avoid it becoming out of date as guidance may be updated or links to webpages may change.</p>

20	41	Simon Cartmel I	<p>Paragraph 8.4.6 I am writing with regard to the Former Imperial College Grounds at Udney Park Road, Teddington. These fields have been in private hands for many decades and not available for community use, other than occasionally and by a local private school. This land remains privately owned, by a developer who wishes to create a number of elderly care facilities that will help address local needs. They also plan to gift to the community a fully developed sports and community facility that will be managed by a Community Interest Company, the Local Council are doing everything possible to inhibit the provision of such community facilities. The proposed development includes multiuse artificial surfaces that are more resilient and more than compensate for the small proportion of the site used for the</p>	No	No						<p>At a Policy level the plan appears reasonable. What is in reasonable is the interpretation of these policies and the behaviour of the council towards one specific opportunity to create a fantastic local amenity and community facility. The council appear unduly influenced by the perspectives of a small group of local residents who want to see no development on the green, unused, fields adjacent to their properties. The local area is blessed with parks and open spaces managed by the Royal Parks Agency. We need sports pitches open to the community that are multiuse and well lit for evening use. There is an opportunity to create such a facility but the blind application of 'policy' is inhibiting this development.</p>	<p>Frankly there needs to be a proper consultation on the future use of Udney Park Playing Fields, not the sham that has happened to date. There are close to 1000 people who have signed up to object to the Local green Space designation of their land, with more being added daily.</p>	<p>Comments noted. No changes required. See Officer response to Comment ID 9 above and Comment ID 324 below. Also see the Officer response in the separate Proposal Map Changes document in relation to Comment ID 4.</p> <p>In addition, it should be noted that statutory consultation has been carried out. As part of the Pre-Publication consultation, an application from a local community group has been received by the Council for the designation of Udney Park Playing Fields as Local Green Space designation. Public consultation on the proposed Local Green Space designation was carried out by the Council as part of the Regulation 19 consultation earlier in 2017.</p> <p>In line with paragraph 76 of the NPPF, "local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances." In addition, it states that "Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period." Therefore, the proper processes for applying for a Local Green Space designation, considering the application and subsequently consulting on it have been followed.</p>
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			care homes. The council are refusing to engage in a reasonable dialogue about what is possible for this private land once a substantial proportion has been gifted to the community. Their stance is 'the answer is no, now what was the question' which is unreasonable and not in the best interests of the community.															
180	59	Louise Spalding , Defence Infrastructure Organisation	Policy LP 34 New Housing Pages: 118-119 Paragraphs: 9.1	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes							Comments noted. Needs assessments have been carried out for housing and in relation to other types of developments and uses, such as in relation to employment, retail, open spaces and playing fields/sports pitches. Housing has been discussed with other authorities through the Duty to Co-operate. Relevant housing targets for the borough are derived from the London Plan, which takes account of limited land supply, and as such the current dwellings per annum target is 315. The Borough's 2015/16 Housing AMR indicates that there are sufficient identified sites in place to exceed the borough's housing targets within the Plan period, also taking into account the 5% buffer. Whilst the Local Plan does not meet the objectively assessed housing need, local evidence and justification elaborates upon the reasons as to why this need cannot be met. Therefore, there is no conflict with the NPPF as paragraph 14 makes clear that needs should not be met if: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development

									<p>demographic need of the Borough would require between 895-915 homes per annum. This assessment notes that this level of need is at the bottom range identified by the demographic projections but is consistent with past trends in population growth.</p> <p>Supply</p> <p>The most up to date monitoring data (2015) published by LBRuT in relation to housing concludes that the Borough can identify the minimum London Plan requirement over the next 5 years. However this must be considered in the context of the current NPPF and London Plan policy requirement for housing targets to be treated as a minimum and exceeded to ensure there is adequate pipeline supply across London as a whole.</p> <p>Whilst 100 units are identified for the Whitton/Heathfield area in LP 34 it is not clear that these are the anticipated housing units on the Kneller Hall site.</p> <p>The 2017 White Paper on Housing makes the following points which are pertinent to achieving housing development on Kneller Hall:</p> <ul style="list-style-type: none"> - the drive to develop more homes on public sector sites - the great weight that is to be attached to the value of using suitable brownfield land within settlements for residential development. - ensuring LPAs adopt ambitious housing targets. 	<p>should be restricted. This is likely to be a matter for discussion during the examination process. No changes required.</p>
237	66	Peter Eaton	Policy LP 34 New Housing		No	No	Yes		<p>I support the limit to 400-500 units in the East Sheen, Mortlake, Barnes Common and Barnes area. <i>See also Publication Local Plan Comment ID 235</i></p>	<p>Comments noted. Support welcomed.</p>

210	118	James Stevens, Home Builders Federation Ltd	Policy LP34: New housing	No						<p><u>The housing requirement is unsound because it falls so far short of the OAN. The plan is therefore insufficiently positively prepared or justified.</u></p> <p><u>The OAN is unsound because it includes no adjustment for market signals or other factors, such as the suppression of household formation</u></p> <p>The Plan will make provision for 3,150 homes, or an annual average of just 315dpa. The Council has assessed the OAN to be 1,047 homes. The Plan therefore is unable to accommodate the OAN in full. Nor does it make a contribution to addressing the wider London strategic housing need. We have discussed this above. The Council has not provided a robust justification for why it considers that it can accommodate no more than 315dpa. Nor has the Council demonstrated that it has utilised collaborative planning under the duty to cooperate to best effect to try and find a solution to this problem. For these reasons we consider that the new planning strategy presented by Richmond-Upon-Thames Council is unsound because it is insufficiently positive and is unjustified in the context of national planning policy which requires local authorities to meet objectively assessed needs “<i>unless the adverse impacts of doing so would significantly outweigh the benefits</i>” (NPPF, paragraph 14).</p> <p>The Council has not adequately tested whether the loss of certain designations will have a more adverse effect than accommodating a larger proportion of the OAN.</p> <p>Objectively assessed housing need</p> <p>Paragraph 9.1.5 of the Local Plan states that the OAN is 1,047dpa.</p> <p>We note on page 75 of the SHMA (December 2016) that based on the DCLG 2014 Household Projections (the advised starting point) and including a vacancy/second homes allowance (3.7% according to paragraph 5.56; a necessary adjustment to convert the projected population into the projected number of households), that the demographic-based need is for 1,050dpa. This relates to the GLA’s 12-year migration assumption that was utilised by the London SHMA.</p> <p>This contrast with the DCLG 2014 Household Projection that indicates that 1,239dpa might be needed. This is illustrated in Table 26 of the SHMA report. The figure only reduces to 1,047 when the GLA’s longer-term trend assumption is applied, which is turn is distorted about</p>		<p>Comments noted. Needs assessments have been carried out for housing and in relation to other types of developments and uses, such as in relation to employment, retail, open spaces and playing fields/sports pitches. Housing has been discussed with other authorities through the Duty to Co-operate. Relevant housing targets for the borough are derived from the London Plan, which takes account of limited land supply, and as such the current dwellings per annum target is 315. The Borough’s 2015/16 Housing AMR indicates that there are sufficient identified sites in place to exceed the borough’s housing targets within the Plan period, also taking into account the 5% buffer. Whilst the Local Plan does not meet the objectively assessed housing need, local evidence and justification elaborates upon the reasons as to why this need cannot be met. Therefore, there is no conflict with the NPPF as paragraph 14 makes clear that needs should not be met if: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted. This is likely to be a matter for discussion during the examination process. No changes required.</p>
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perceptions relating to capacity in London. Of course, as the HBF has long argued, at the London Plan examination, and at other London Boroughs local plan examinations, the extent to which migration can actually occur depends on the ability of the authorities of the wider south east to provide land for London's migrants. This is not happening. Neither the Mayor of London, nor Richmond-Upon-Thames can point to any example of an adopted or emerging local plan in the south east of England that makes provision for increased population as a consequence of the Mayor of London's migration assumptions. We refer the Council to the letter from the South East England Councils to the Mayor of London dated 8 December 2016 to this effect. (It is notable that the South East Councils are urging the Mayor to undertake a review of London's green belt to accommodate London's unmet strategic housing need).

Unless Richmond-Upon-Thames can demonstrate that provision is being made outside of London for the Mayor's migration assumptions, it must default to the unadjusted DCLG 2014 Household Projection of 1,239dpa as providing the truer forecast of future housing need.

We are also concerned that the Council, like the Mayor of London, is confusing the issue of the objective assessment of housing need with supply and is therefore allowing perceptions (moreover perceptions that have largely been untested recently) about London's capacity to accommodate the demographic projections. This is apparent in paragraph 5.40 of the SHMA. This is contrary to national planning policy and guidance (the PPG). The PPG states:

"The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints."

The SHMA concludes in favour of the use of the GLA Long-Term Trend (i.e. 1,047dpa) as this is consistent with the GLA's SHMA 2013 which supported the new London Plan 2016. This assumes net internal out-migration from London to increase. The Council's SHMA 2016 report considers that this is a reasonable conclusion, although we would beg to differ, since (as we argued at the London Plan examination) for this to be true it would require the South East authorities to factor this increased inward

migration from London into their own projection modelling. This is something they have singularly failed to do, or even acknowledge as a potential issue. Nevertheless, the Inspector examining the London Plan concluded in favour of the Mayor's alternative migration scenario albeit he warned that the Mayor's SHMA *"includes assumptions relating to migration...likely to be material to the preparation of local plans outside London"*. (Inspector's report, paragraph 8).

The conclusion reached in paragraph 5.45 that the two most robust scenarios are the Unconstrained GLA Long-term Projection and the Constrained GLA SHLAA Projection is wrong. We would concede that the Unconstrained GLA Long-Term Projection may be a sound one (on the basis that it has been endorsed by the London Plan examining inspector), despite our reservations described above, but a 'constrained' projection would be entirely inconsistent with national policy.

That the Council has alighted upon the GLA Long-Term Trend as being the more scenario is probably wise in the light of national planning policy and guidance. What is apparent from this is the extent to which the Richmond Plan under-delivers against this figure.

Other adjustments

The Council has made no other adjustments to the baseline projected demographic need such as adjustments for the suppression in household formation among the young, or an increase to compensate for poor affordability, or an increase to facilitate the supply of more affordable homes. The annual affordable housing need is 964dpa – a figure that is more than three times the overall annual requirement.

Such adjustments are common elsewhere in the country, even if the adjustments are quite small. The Council can scarcely argue that Richmond is not subject to extreme problems of affordability, since page 128 of the SHMA acknowledges the problems. Paragraph 9.3.1 refers to the significant affordability issues in the borough.

In view of the affordability problems the Council ought to have done more to explore opportunities to increase the housing supply above the benchmark London Plan target, as the London Plan expects.

247	265	Hannah Cook, Spelthorne Borough Council	LP 34 New Housing							<p>Thank you for consulting Spelthorne Borough Council on the LB Richmond final version of the Local Plan. At this stage this is an officer level response relating to the issues which are likely to have direct or indirect impacts on the interests of Spelthorne Borough Council.</p> <p>Policy LP34 states that there is a target of 315 homes per annum, with the Council able to meet its strategic housing target set out in the FALP, without using Greenfield sites. It is noted that this is informed by the 2013 London SHMA and SHLAA. However, a more recent Richmond SHMA, published in 2016, notes a need for 1,047 homes which is an increase over the first draft local plan consultation (895-915 homes pa). Whilst it is noted that LB Richmond have not asked Spelthorne to take any of its need, it is considered that failing to meet a greater proportion of the OAN will have implications for neighbouring authorities and will not address the issue of out migration from London.</p>	<p>Although it is noted that the borough is severely constrained, Spelthorne would wish to be assured that all options have been thoroughly explored with regards to meeting as much of the objectively assessed housing need as possible.</p>	<p>Comments noted. The local evidence and justification elaborates upon the reasons as to why this need cannot be met.</p> <p>Needs assessments have been carried out for housing and in relation to other types of developments and uses, such as in relation to employment, retail, open spaces and playing fields/sports pitches. Housing has been discussed with other authorities through the Duty to Co-operate. Relevant housing targets for the borough are derived from the London Plan, which takes account of limited land supply, and as such the current dwellings per annum target is 315. The Borough's 2015/16 Housing AMR indicates that there are sufficient identified sites in place to exceed the borough's housing targets within the Plan period, also taking into account the 5% buffer. Whilst the Local Plan does not meet the objectively assessed housing need, local evidence and justification elaborates upon the reasons as to why this need cannot be met. Therefore, there is no conflict with the NPPF as paragraph 14 makes clear that needs should not be met if: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted. This is likely to be a matter for discussion during the examination process. No changes required.</p>
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249	219	Craig Hatton, Persimmon Homes - Thames Valley	LP34 New Housing	No	Yes	Yes	Yes	<p>Persimmon Homes would regard that the Plan is unsound because it does not go far enough in planning to accommodate the significant unmet housing need in for the Borough</p> <p>The target set for the borough is 315 dwellings per annum for the ten year period 2015 – 2025 and this is likely to be rolled forward until the completion of the review of the London Plan. This review will likely lead to an increase in this housing target on the basis that it is expected that London's population will continue to grow despite the increased flow of people on their late twenties and thirties to areas where larger properties are considered to be more affordable. It is clear from the evidence within the SHMA that the borough's objectively assessed needs of 1047 dwellings per annum will almost certainly not be provided for at any point over the plan period to 2033. It would seem that this SHMA OAN figure is a conservative one which is likely to increase through future iterations of the household projections data. That the plan is set out for provision of 315 dwellings per annum means that there must be a concern that the plan is not positively prepared. Whilst it is acknowledged that the borough is heavily constrained and has a number of key sites which must be conserved, we are concerned that the housing provision does not fully provide for the dwellings that could be provided. Using these figures, there is an unmet need for Richmond of some 7,320 homes for the period 2015 – 2025. The housing requirement is therefore unsound as it does not provide for the OAN and does not meet the requirements of paragraph 47 on the NPPF. The Council has not provided a justification as to why it considers that the borough cannot accommodate a higher figure than the 315 dpa as stated. The Plan is therefore considered to not be positively prepared or justified.</p> <p>The SHMA identifies that there is a strong relationship with the other boroughs that make up South West London – namely Hounslow, Wandsworth and Kingston. There also strong relationships on matters of housing, jobs and commuting patterns with other London boroughs and Surrey. The Plan does not appear to make sufficient plan to accommodate London's wider strategic unmet need. Hounslow, an adjacent authority, is similarly constrained with significant areas of green belt/metropolitan open land, the presence of the River Thames and the addition of Heathrow to its northern boundary. However Hounslow's adopted plan makes provision for the delivery of 822 dpa with the potential for this to increase to over 1000 dpa should necessary transport infrastructure improvements be delivered. This is significantly higher than that which Richmond has accounted for and there appears to be no suitable justification as to why this is the case.</p>	<p>As part of meeting both the unmet need in Richmond and contributing to meeting the wider London unmet need, it is necessary for the Council to explore how it can meet these needs. It would appear that from the review of the evidence this has not taken place in sufficient detail. The Council also does not demonstrate suitably what it has done to explore how it can have some or all of its unmet housing need accommodated wither within neighbouring boroughs) or with other authorities in Surrey. The adopted Hounslow Local Plan does not make provision for any of Richmond's unmet need and this also applies to Wandsworth. We are concerned that there is insufficient strategic planning within the south west London HMA and the wider housing market of Surrey to plan for the likely overspill from London. In most cases were an authority is constrained, there is a natural fall back position with the inclusion of a review mechanism to take place either 3 or 5 years into the plan period. This plan does not include a commitment to any such review and the Council appears to be overly reliant on citing its capacity constraints as justification for this. The London Plan expects all Boroughs to make a contribution to meeting the wider strategic unmet need of the London area and this unmet need is significant and likely to only increase. The Richmond Plan does not contribute to helping to address these needs. The housing target of 315 dpa is the lowest of all London Boroughs who have had plans adopted or published for consultation. The Council is therefore exacerbating the situation by not meeting anywhere near its own needs.</p>	<p>Comments noted. Needs assessments have been carried out for housing and in relation to other types of developments and uses, such as in relation to employment, retail, open spaces and playing fields/sports pitches. Housing has been discussed with other authorities through the Duty to Co-operate. Relevant housing targets for the borough are derived from the London Plan, which takes account of limited land supply, and as such the current dwellings per annum target is 315. The Borough's 2015/16 Housing AMR indicates that there are sufficient identified sites in place to exceed the borough's housing targets within the Plan period, also taking into account the 5% buffer. Whilst the Local Plan does not meet the objectively assessed housing need, local evidence and justification elaborates upon the reasons as to why this need cannot be met. Therefore, there is no conflict with the NPPF as paragraph 14 makes clear that needs should not be met if: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted. This is likely to be a matter for discussion during the examination process. No changes required.</p>
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219	239	Dean Jordan, DP9 on behalf of Richmond Athletic Association	New Housing LP 34						Our client supports the Boroughs target to deliver 3,150 homes for the period 2015/2025. However, to align with the London Plan (2016) the policy should note that this is a minimum target for the period and the Council will endeavour to exceed this where possible. The policy also notes that the majority of new homes will be built in Richmond. This is strongly supported by our client.		Comments noted. No changes required.
262	10	Caroline Wilberforce, Indigo Planning on behalf of Ashill Land Limited	Policy: LP 34 New Housing	No	Yes				<p>We act on behalf of Ashill Land Limited and write in response to the above consultation. We welcome the opportunity to comment upon the policies and allocations set out in the Publication version of the Local Plan.</p> <p>Background</p> <p>Ashill Land Limited owns a site at 9 Tudor Road and 27 Milton Road in Hampton, Richmond, TW12 2NH. Historically the site and its buildings were used for car sales and car repairs/servicing, however, all commercial operations ceased back in 2011.</p> <p>Following positive pre-application discussions with officers, a planning application (reference: 16/3019/FUL) was submitted in July 2016 for the redevelopment of this site to provide seven family dwellings.</p> <p>The principle of residential redevelopment of the site has been accepted by officers and the application is due to be reported to the Planning Committee on 22 March for a decision.</p> <p>Indigo Planning has previously submitted representations on behalf of Ashill Land Limited to the "Scope and Rationale for Review of Planning Policies (Core Strategy 2009 and Development Management Plan 2011), together with the Emerging site Allocations", the "Pre-publication Consultation Version of the Local Plan" and the "Hampton draft Village Planning Guidance", all in relation to this site.</p> <p>Purpose of representations</p> <p>In accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012, local planning authorities are required to make a copy of each of the proposed submission documents available under Regulation 19.</p> <p>The purpose of a consultation under Regulation 19 is to ensure that the proposed submission documents have</p>	There are a number of sustainable sites within the Borough, including 9 Tudor Road and 27 Milton Road, which could help to boost the supply of housing thereby providing an important contribution to meeting the Council's OAN.	Comments noted. It should be noted that 16/3019/FUL was granted permission on 7 April 2017. In relation to the comments on meeting the Council's OAN, needs assessments have been carried out for housing and in relation to other types of developments and uses, such as in relation to employment, retail, open spaces and playing fields/sports pitches. Housing has been discussed with other authorities through the Duty to Co-operate. Relevant housing targets for the borough are derived from the London Plan, which takes account of limited land supply, and as such the current dwellings per annum target is 315. The Borough's 2015/16 Housing AMR indicates that there are sufficient identified sites in place to exceed the borough's housing targets within the Plan period, also taking into account the 5% buffer. Whilst the Local Plan does not meet the objectively assessed housing need, local evidence and justification elaborates upon the reasons as to why this need cannot be met. Therefore, there is no conflict with the NPPF as paragraph 14 makes clear that needs should not be met if: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted. This is likely to be a matter for discussion during the examination process. No changes required.

been prepared in accordance with the Duty to Cooperate, legal and procedural requirements and whether it is sound. NPPF paragraph 182 considers a plan “sound” if it is:

- Positively prepared – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

These representations demonstrate that the Council’s approach to its housing target is unsound and that Policies LP36 and LP40 are unsound.

We note that the Publication Local Plan was adopted for development management purposes at a Cabinet Meeting of 13 December 2016.

Unsoundness of Policy LP34

Policy LP34 of the Publication version of the Local Plan outlines that Richmond’s housing target, obtained from the London Plan, is to deliver 3,150 homes between 2015-2025, which equates to 315 dwellings per annum.

It is important to note that the Further Alteration to the London Plan (FALP) notes in paragraphs 3.18 and 3.19 that:

“Boroughs must be mindful that for their LDF’s to be found sound they must demonstrate that they have sought to boost significantly the supply of housing as far as is consistent with the policies set out in the Framework”.

It goes on to state that:

“Boroughs should use their housing supply targets (set out in Table 3.1 of the London Plan) as minima, augmented with additional housing capacity to reduce the gap between local and strategic housing need and supply”.

									<p>This also needs to be seen in the context of paragraph 47 of the National Planning Policy Framework(NPPF) which states that to boost significantly the supply of housing, Local Planning Authorities should (amongst other things):</p> <p><i>“Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying sites which are critical to the delivery of the housing strategy over the plan period”.</i></p> <p>Our previous representations to the Pre-Publication Consultation Version of the Local Plan noted that the Draft Strategic Housing Market Assessment (SHMA) (June 2016) prepared by GL Hearn for Richmond Council stated that the Objectively Assessed Needs (OAN) in the Borough was 913 dwellings per annum. The final version of the SHMA (December 2016) has now been published and the OAN has increased to 963 dwellings per annum. The Council’s own evidence base therefore clearly shows an increased need for housing in the Borough.</p> <p>By simply relying on the Council’s minimum London Plan housing target, Policy LP34 has not been positively prepared and makes no effort to boost housing supply within the Borough. It conflicts with paragraph 47 of the NPPF in that it ignores its own evidence base and falls woefully short of its OAN of 963 dwellings per annum, identified by GL Hearn.</p>	
227	234	Alex Chapman, Terence O’Rourke Ltd on behalf of Julian Larkin, Redrow Homes	LP 34 New Housing		No			<p>Introduction: On behalf of Redrow Homes and its interest at Kempton Park, Sunbury on Thames, in Spelthorne Borough, we would like to take this opportunity to submit comments to London Borough of Richmond’s consultation on their Final Version Local Plan document. The comments are made with particular reference to the relationship of the Housing Market Areas in north Surrey and south west London and options relating to a coordinated approach between Richmond and Spelthorne regarding the provision of new homes against objective assessment of housing needs (OAN), generally covered by the Duty to Cooperate.</p> <p>Kempton Park: Redrow Homes is currently promoting land at Kempton Park for a residential led development through Spelthorne Borough Council’s Local Plan process. On 10 January 2017 Redrow submitted land at Kempton Park to Spelthorne’s call for sites exercise. The submission covered for the entirety of the land at Kempton Park, including the</p>	<p>Insert additional bullet (C.) in Policy LP 34: Through the Duty to Cooperate, the Borough will engage with neighbouring authorities to meaningfully explore opportunities to accommodate some of the Borough’s unmet housing need within their areas.</p>	<p>Comments noted. Housing issues and OAN have been discussed with other authorities, including Spelthorne Borough Council, through the Duty to Cooperate. It would not be appropriate for the Richmond Local Plan to consider how housing needs can be met outside of the borough boundary, and it is for Spelthorne Borough Council to consider proposals for land at Kempton Park. No changes required.</p>

operational areas of the racecourse and other associated buildings, offering the opportunity to use previously developed land whilst acknowledging that not all of the site would be developed and that there would also be an opportunity to retain a significant area of undeveloped land within the Green Belt. The total gross developable area now stands at approximately 230 acres and Redrow's initial capacity studies indicate that the site could provide for circa 3,000 new homes.

Jockey Club Racecourses Ltd fully supports this move as an enabling measure, facilitating comprehensive re-investment in its other UK racing facilities for the betterment of the horseracing industry. Jockey Club Racecourses Ltd remains committed to investing in racing in Surrey, including a major boost to the facilities at nearby Sandown Park in Elmbridge.

As background, sites in Spelthorne with planning permission, allocated in the Site Allocation DPD (2009) or identified as contributing to housing supply in the Housing Land Availability Assessment (HLAA 2008 (2014 update)) provide for less than 1,350 new homes. Recent housing completion rates within the Borough hover around 200 dwellings per annum, whilst the OAN is in excess of 552 dpa. The Kempton Park site is the largest known reasonable alternative site in the borough that is being promoted for residential development. It lies adjacent to a train station and benefits from good links to the strategic highway network. The site is not publically accessible and is of low environmental value. There are no other large vacant / available sites in the borough where a known development interest for residential use has existed.

Duty to Cooperate:

Spelthorne and Runnymede's Strategic Housing Market Assessment (November 2015) reveals that there is a series of inter-connected local housing markets in the area, including the North West Surrey HMA, which includes Spelthorne and Runnymede, and the South West London market area, which includes the London Boroughs of Kingston and Richmond.

Spelthorne is delaying progress with its local plan, having only just undertaken the call for sites, and is not therefore seeking currently to address its OAN of 552 – 757 new homes a year over the 2013-33 (contrary to the NPPF). We note that Richmond is similarly constrained (as Spelthorne) by Green Belt and MOL. We are concerned that, despite the opportunity that exists, Spelthorne will use its delayed process to avoid positive discussion with

										<p>Richmond regarding the opportunities for development which will, inevitably, reflect on Richmond when the local plan inspector considers the matter of Duty to Cooperate. Delay is not justification in itself for the matter to be set aside.</p> <p>First, London Borough of Richmond’s emerging Local Plan document should try to meet the OAN for housing in full, to be consistent with the NPPF’s paragraph 47, to boost significantly the supply of housing. The borough’s 2016 SHMA highlights that the OAN is 895 – 915 dwellings per annum, which when compared alongside the housing requirement, within Policy LP34, of 315 dwellings per annum creates an anticipated shortfall of between 560 – 600 dwellings per annum.</p> <p>Whilst 315 dwellings per annum is inline with the target for the borough, as set out in the Further Alterations to the London Plan, Richmond is required by NPPF Paragraph 179 to engage with neighbouring authorities, such as Spelthorne, through the duty to cooperate, to try and meet its development requirements that cannot wholly be met within its area. This includes the OAN for housing in full, to significantly boost the supply of housing, as required by NPPF Paragraph 47.</p> <p>The Duty to Cooperate Statement (January 2017) provides details of the engagement with Spelthorne. It indicates that the engagement was largely focused on the identification of issues faced in the boroughs. Clearly, no consideration was given to the potential for Spelthorne to meet some of Richmond’s unmet housing need through positive planning. Such an undertaking should be supported by a robust testing of available and suitable land in Spelthorne, where it is capable of contributing to sustainable patterns of development. Richmond should commit to securing opportunities for its unmet need to be accommodated in neighbouring authorities, by working with them through engagement in the preparation of their Local Plans. This should be directly provided for in Policy LP 34.</p>	
240	22	Francine Bates & Russell Campbe II	Policy LP 34 New Housing							<p>We support the limit to 400-500 units in the East Sheen, Mortlake, Barnes Common and Barnes area – LP34.</p> <p>See also Publication Local Plan Comment ID 238</p>	Comments noted. No changes required.

312	189	Shaun Lamplough, Mortlake with East Sheen Society	Housing New Policy LP34: New Housing Page 118 Item B Table Page 119 para 9.1.6						<p>MESS comments on Pre-Publication Local Plan, August 2016 - The new housing units table should be clarified if the total for East Sheen includes the units expected on the Stag Brewery site.</p> <p>Council's response to MESS comments, January 2017 - A provisional figure for the Stag Brewery is contained in the detailed future supply for large sites set out in the AMR Housing Reports. The totals for the broad locations reflect the overall pattern of future housing land supply in the AMR housing land supply has been used to against the strategic dwelling requirement.</p> <p>MESS comments on Publication Local Plan, February 2017 - Council's response is not understood and needs to be redrafted.</p> <p>MESS comments on Publication Local Plan, February 2017 - It is noted that development should optimize housing provision for different types of location within the relevant density range taking into account the London Plan Density Matrix.</p>	Comments noted. The policy sets out the broad approach to housing numbers and density. No changes required.
401	169	Brianne Stolper, Greater London Authority on behalf of Mayor of London	Policy: LP 34 New Housing						<p>Thank you for consulting the Mayor of London on the above document and requesting a statement of general conformity with the London Plan. 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. Representations from Transport for London (TfL) which I endorse are set out in Annex 1. [See Publication Local Plan Comment IDs 183 to 192]</p> <p>The GLA responded to the pre-publication stage of Richmond upon Thames' Local Plan in a letter dated 23 August 2016. GLA officers have met with officers from Richmond for Duty to Co-operate meetings and have had other direct contact throughout the preparation of the Local Plan Review.</p> <p>The Mayor has carefully considered the Borough's draft Local Plan and whilst he supports many aspects of the plan, he is of the opinion that there remain a couple of outstanding issues that need to be addressed before the Local Plan can be considered as being in conformity with the London Plan. Detailed comments on these matters are set out below and both GLA and TfL officers are keen to work with Richmond to resolve any outstanding issues.</p> <p>Housing</p> <p>As mentioned in our letter dated 23 August 2016, the Mayor welcomes Richmond's commitment to meet its minimum housing monitoring target of 315 dwellings per annum as set out in table 3.1 of the London Plan. However the London Plan, Policy 3.3 is clear that this is a minimum</p>	Comments noted. It is considered that the policy is clear that the Council seeks to exceed the minimum strategic dwelling requirement (as stated within the second sentence of Policy LP 34, A.). The Borough's 2015/16 Housing AMR indicates that there are sufficient identified sites in place to exceed the borough's housing targets within the Plan period, also taking into account the 5% buffer. No changes required.

									figure and boroughs are required to augment this figure to address need. It is noted that the Borough's Strategic Housing Market Assessment (SHMA) now identifies a higher need for housing of 1,047 dwellings compared to the previous figure of 895 - 915, which has increased the gap between need and supply to 732 dwellings per annum. With regard to meeting the higher housing need, the Mayor is pleased to see the borough will be exceeding its target for the next five to ten years and urges the borough to continue to seek ways in which to supplement additional housing capacity. Policy 3.3E of the London Plan identifies the types of locations which could provide additional housing capacity, such as town centres, stations and sensitive intensification of residential areas.		
413	73	James Cogan, GL Hearn on behalf of Evergreen Investment Retail Company	Policy: LP 34 New Housing	No	Yes				<p>See also Publication Local Plan comment, Objective ID 409 - for preamble and introductory text to this representation</p> <p>Policy LP 34 - New Housing</p> <p>3.18 Policy LP 34 of the Richmond Local Plan identifies a minimum target to deliver 3,150 homes between 2015 and 2025 at 315 dwellings per annum.</p> <p>3.19 The minimum housing target at Table 3.1 of the London Plan (2016), as reflected at Policy LP 34, represents a capacity based housing target rather than the objectively assessed housing need. Paragraph 47 of the NPPF states that local planning authorities should ensure that Local Plans meet the <i>'full, objectively assessed needs for market and affordable housing in the housing market area'</i>. In this regard the Council's Strategic Housing Market Assessment (hereinafter 'SHMA') identifies an objectively assessed housing need in the borough of at least 1,047 dwellings per annum between 2014 and 2033.</p> <p>3.20 On this basis, Policy LP 34 of the Richmond Local Plan fails to meet the <i>'full, objectively assessed needs for market and affordable housing in the housing market area'</i>. Therefore in its current form Policy LP 34 is not 'positively prepared' and consequently must be found not to be 'sound' under the provisions of paragraph 182 of the NPPF.</p> <p>3.21 Furthermore, it noted that the Mayor of London is expected to undertake a full review of the London Plan as early as 2017. As a result the housing target for the borough is likely to be subject to change. It is therefore contended that those policies of the Richmond Local Plan, and in particular Policy LP 34, must be flexible to accommodate any further change to the London Plan</p>	<p>3.22 For the above reasons our client cannot support Policy LP 34 of the Richmond Local Plan in its current form, and suggest that Policy LP 34 be amended as follows:</p> <p>See Appendix (5) of this document for a 'marked-up version' of the proposed amendments to Policy LP 34</p>	<p>Comments noted. Needs assessments have been carried out for housing and in relation to other types of developments and uses, such as in relation to employment, retail, open spaces and playing fields/sports pitches. Housing has been discussed with other authorities through the Duty to Co-operate. Relevant housing targets for the borough are derived from the London Plan, which takes account of limited land supply, and as such the current dwellings per annum target is 315. The Borough's 2015/16 Housing AMR indicates that there are sufficient identified sites in place to exceed the borough's housing targets within the Plan period, also taking into account the 5% buffer. Whilst the Local Plan does not meet the objectively assessed housing need, local evidence and justification elaborates upon the reasons as to why this need cannot be met. Therefore, there is no conflict with the NPPF as paragraph 14 makes clear that needs should not be met if: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted. This is likely to be a matter for discussion during the examination process. No changes required.</p>

										housing target over the lifetime of the Richmond Local Plan.		
202	118	James Stevens, Home Builders Federation Ltd	Publication Local Plan - unmet housing need	No	No					<p>The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational plc's, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year.</p> <p>Duty to Cooperate</p> <p><u>The Plan is unsound because it contains no plan to accommodate the significant unmet housing need that emerges in a) Richmond; and b) London's wider strategic unmet need.</u></p> <p>The SHMA (December 2016) identifies a strong housing market and economic inter-relationship with the boroughs of South West London – principally Hounslow, Wandsworth and Kingston. There are, however, housing market and commuting relationships with other London Boroughs and with Surrey.</p> <p>The Council is confronted by a large unmet housing need as assessed by its SHMA. The OAN is for 10,470 homes over the plan period 2015-2025 but the Council is only planning to provide 3,150 homes. The unmet need therefore would be 7,320 homes. There is also a strategic London-wide unmet need of at least 7,000dpa to consider. It is interesting that the Local Plan does not refer to this additional problem, even though the London Plan exhorts the London Boroughs to increase supply above the benchmark targets in the London Plan to close the gap (see London Plan Policy 3.3Da).</p> <p>London Plan Policy 3.3Da requires the London boroughs to assess their housing need in line with the requirements of the NPPF. This is because the housing monitoring targets contained in the London Plan are not based on a fully NPPF-compliant assessment of housing need. The Mayor's <i>Housing SPG</i> reiterates this point. The London Boroughs are required to assess their local needs drawing upon the housing benchmarks provided in table 3.1 of the London Plan. We note that the Council has provided an NPPF complaint assessment of need in its SHMA. This identifies an OAN of 1,047 dwellings per annum (see also paragraph 9.1.5 of the Plan).</p> <p>London Plan Policy 2.2: London and the Wider Metropolitan Area, part E requires the London Boroughs</p>	<p>Continued:</p> <p>The NPPF states in paragraph 113 that "distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status". It is unclear to us whether Council in preparing its new Local Plan has reconsidered the efficacy of continuing with these restrictions in light of the challenging new planning context both in London and nationally.</p>	<p>Comments noted. Needs assessments have been carried out for housing and in relation to other types of developments and uses, such as in relation to employment, retail, open spaces and playing fields/sports pitches. Housing has been discussed with other authorities through the Duty to Co-operate. Relevant housing targets for the borough are derived from the London Plan, which takes account of limited land supply, and as such the current dwellings per annum target is 315. The Borough's 2015/16 Housing AMR indicates that there are sufficient identified sites in place to exceed the borough's housing targets within the Plan period, also taking into account the 5% buffer. Whilst the Local Plan does not meet the objectively assessed housing need, local evidence and justification elaborates upon the reasons as to why this need cannot be met. Therefore, there is no conflict with the NPPF as paragraph 14 makes clear that needs should not be met if: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted. This is likely to be a matter for discussion during the examination process. No changes required.</p>

when preparing their local development plan documents to “work with authorities and agencies in neighbouring regions outside Greater London to develop common approaches to issues of cross-border significance”.

The Council needs to demonstrate what it has done to explore how it can accommodate the unmet housing need elsewhere either within one of its neighbouring London Borough authorities or elsewhere, possibly in Surrey (but not necessarily restricted to this county). Having commented on the Hounslow Local Plan and participated in its examination we are aware that the Hounslow Plan makes no provision for Richmond’s unmet need. The same is true of Wandsworth. We are also aware from having commented recently on Elmbridge’s emerging local plan (December 2016) that there is no proposal in the emerging plans for the HMA based on Elmbridge, Mole Valley, Epsom and Ewell and Kingston Upon Thames to accommodate any element of Richmond’s unmet need.

The Council needs to demonstrate that in preparing its plan it has diligently explored how to accommodate its unmet need, as required by statute.

We have noted the *Duty to Cooperate Statement* (January 2017). It is curious that this paper does not refer explicitly to an issue as important as the unmet housing need. We note paragraphs 5.3 – 5.5 but this does not tell us if the Council raised directly with its HMA partners or neighbouring authorities the issue of its unmet need of 7,320 homes. The Council needs to demonstrate that it has written to other authorities seeking assistance to accommodate the unmet need. Local plan examinations over the last three years have established this as an essential element in determining whether a local authority has properly discharged its legal obligations under the duty to cooperate – discharging its obligations responsibly and diligently. The examinations of the Birmingham, Brighton & Hove, Coventry, Crawley, Hastings, Lewes, Luton, and Ipswich local plans provide evidence of this approach. This is now an established test of the Council’s tenacity in trying to meet an unmet need.

The Council will also need to demonstrate that it has discussed with other local planning authorities what the demographic implications will be as a consequence of there being such a large unmet need in Richmond. This will result in increased housing demand in neighbouring areas as households are forced to move elsewhere. The NPPF identifies planning for homes as a strategic priority (paragraph 156). The NPPF states in paragraph 179 that

local authorities have a duty to work together “to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework”. The Council’s response to this important strategic issue is inadequate.

Such a large unmet need cannot be swept to one site and ignored for the next ten years. The Council cannot present a plan with no intimation (let alone a strategy) of how this question will be address over the next decade. The Council cannot ignore this. This would be irresponsible and the Council would be failing to play its part in addressing the Country’s critical housing shortage (as discussed in the Government’s Housing White Paper: *Fixing our broken housing market*, DCLG, February 2017). Evidence of large unmet needs such as this in other parts of the country would prompt very close investigation by the Planning Inspectorate, acting for the Government, on explore precisely what the Council in question has done to try and accommodate that need. This would be a matter of close discussion at the examination. The Plan does not even include a commitment to a review which is a common fall-back position used by local authorities to tackle the problem (e.g. Vale of White Horse, Cherwell, Ipswich Councils, Hounslow Councils).The Council is not absolved from trying to find a solution to the problem merely by citing its capacity constraints.

Meeting London’s strategic unmet need: increasing supply above the London Plan benchmarks

As observed above, London Plan Policy 3.3Da expects all of the London Boroughs to play their part in trying to close the gap between London’s strategically assessed housing need for at least 49,000dpa and the capacity constrained supply of 42,000dpa. As paragraph 3.19 of the London Plan explains, “Boroughs should use their housing supply targets in Table 3.1 as minima, augmented with additional housing capacity to reduce the gap between local and strategic housing need and supply”.

Paragraph 3.19i sets out what he London Boroughs are expected to do to exceed the London Plan benchmark targets. This includes “collaborative working with other relevant partners”.

As the London Plan also acknowledges, the true level of need in London over the next 11 years 2015 – 2026 is much higher – at 62,000 dwellings a year – (paragraph

3.16b). The OAN is only 49,000dpa if this level of delivery can be sustained over 21 years, 2015-2036 (paragraph 3.16b of the London Plan). It is because the need is higher in the first decade that the London plan states in paragraph 3.16b that *“In light of the projected higher need, especially at the start of the plan period, this figure (i.e. 49,000dpa) should be regarded as a minimum”*.

By planning for only 315dpa it is very apparent that Richmond’s Plan will make no contribution to helping to address London’s strategic needs. Indeed, to date, very few of the London Plans have demonstrated an ability to close this strategic gap in supply as the table below records. This table shows all those London Boroughs who have published plans for consultation or who have had plans examined and adopted since the new London Plan was adopted (March 2015) where these have established new housing targets with reference to the new London Plan. Only Camden, Croydon and Hammersmith & Fulham have provided increases above the London Plan targets but these increases are outweighed by under-shootings elsewhere (Lambeth, RBKC and Southwark). So far, London is on course for a deficit nearing 1,000dpa against the London Plan capacity constrained minimum requirement of 42,000dpa.

See Appendix 22 of this document for a table included in this representation

Because this is an undersupply against the lowest assessed level of the OAN (49,000dpa as opposed to 62,000dpa) and even then the OAN is based on heavily discounted demographic projections that are much lower than the official DCLG projections because of the Mayor’s assumptions about migration, we have a housing disaster on our hands in London.

The Council needs to do more to deliver a higher housing requirement to help meet more of its own unmet needs.

Paragraph 3.1.7 states that the Local Plan *“can meet its strategic housing target without using greenfield sites”*. The London Plan, however, requires each borough to consider how it can exceed the strategic target to meet its own localised assessment of needs as well as close the strategic gap in supply. The Council therefore is required to do more than the minimum. It should reconsider the efficacy of safeguarding these green field sites given the pressing need for housing. The Plan suggests that there are alternative options. For example, paragraph 9.1.7 of the Plan states that green field land in the Borough is

covered by protective designations. It does not say what type of designations these are. We note that there is no up to date SHLAA that explores potential land supply to complement the strategic level London SHLAA. The Council last undertook an assessment of land supply in 2006. This is unsatisfactory. It is quite contrary to national planning policy not to undertake a more up-to date assessment of need. Without an up-to-date SHLAA it is impossible to assess the potential of the Borough to accommodate more of its unmet housing need. The London SHLAA 2013 to inform the London Plan is a much higher level, largely theoretical, assessment of capacity within London. It is no substitute for local assessments which test further the assumptions in the London SHLAA. The London Plan makes this clear in Policy 3.3 parts E, F and G and the supporting text as well as paragraphs 1.1.19 to 1.1.21 of the *Housing SPG* (March 2016).

We note a *Sustainable Urban Development Study* dated September 2008. We would have expected to see a more up-to-date study that address the requirement of London Plan Policy 3.3G. This September 2008 study applied the current London Plan density matrix, but even though the new London Plan (March 2016) retained the same density matrix unchanged, it does include the expectation that the Boroughs will apply a *'rigorous appreciation of housing density (which) is crucial to realising the optimum potential for sites...(the density matrix ranges) are broad, enabling account to be taken of other factors relevant to optimising potential...'*.

In view of the size of the unmet need, we consider that the Council ought to have considered more critically the density of development within the borough.

The Council ought to also reconsider whether all its open space designations are still justified. The NPPF places significant weight on protecting land from development included within the designations listed in footnote 9, but beyond these, local authorities should consider whether it is appropriate to release land for development in other areas. The Council could also explore reviewing its green belt to accommodate a greater element of the unmet housing need where green belt land may perform fewer of the function of the green belt. We note that the London Plan, echoing national policy, does allow the London Boroughs to explore this as an option (London Plan Policy 7.16) even though the Mayor has not explicitly supported a strategic level green belt review in London.

We note the 2006 report titled *Review of Land Subject to*

Protective MOL and OOLTI Designation. MOL standards for Metropolitan Open Land. OOLTI stands for Other Open Land of Townscape Importance. The Council has included its 'Green Chains' in this latter category. This latter category – OOLTI – does not warrant the same degree of protection as the footnote 9 designations listed in the NPPF. Land in this category, does provide the opportunity for the Council to allocate land to help meet more of its own housing need. It is apparent from this report, such as paragraph 3.1, that this study was undertaken in the context of Planning Practice Guidance (not even the later Statements) and not against the new context of the NPPF which expects local authorities to provide a significant boost to housing supply, and the London Plan which expects the Boroughs to increase supply above the minima targets. We note that the report concludes:

4.2 Desk top survey work and site visits recorded through survey sheets has indicated that a potential 88no. new sites could be designated with approval from Richmond Borough Cabinet. On the basis of the designation criteria, 38no. sites were noted as 'Highly Recommended' for designation, while 50no. Sites were recorded for 'Possible Designation'.

4.3 Designation of these sites would further increase the areas of protected open land, recreational spaces, visual amenity and the character of the Borough. This is in accordance with the Borough, London-wide and national policy and is of special importance in the areas of the Borough identified as being deficient in open space.

The report goes on to describe the categories considered, including the category of open land of townscape importance. It has this to say:

ENV 3 OTHER OPEN LAND OF TOWNSCAPE IMPORTANCE

5.36 Townscape importance. In considering development on sites adjoining these open areas the Council will take into account any possible visual impact on the character of the open land. 5.37 In some parts of the Borough, open areas, which are not extensive enough to be defined as green belt or metropolitan open land, act as pockets of greenery of local rather than London-wide significance. Many of these are of townscape importance, contributing to the local character and are valued by residents as open spaces in the built up area. These areas include public and private sports grounds, some school playing fields, cemeteries, some large private gardens and some allotments, all of which the Secretary of State for the

Environment has recognised can be of great importance to the character of a neighbourhood. LPAC through work on urban green space also recognises the importance of such land. The larger areas are shown on the proposals map but there will be other smaller areas which merit protection. The purpose of this policy is to safeguard open land and ensure that it is not lost to other uses without good cause. The policy recognises that there may be exceptional cases where it would be appropriate to allow modest buildings and extensions which are related to the function of Other Open Land of Townscape Importance (OOLTI) and when this would not have a harmful effect on its character.

Many of these restrictions (visual amenity and character) strike one as non-essential ones in the context of the London housing crisis and Richmond's huge unmet need. It would appear, though, that the result of the report was that the Council increased the number of its designations. As the website introducing the report states:

"Allen Pyke & Associates carried out a review of open land designations (pdf: http://www.richmond.gov.uk/ldfmon_open_land_review_2006_final.pdf, 194KB) in the borough to assess whether they were appropriately designated. They then reviewed a further 100 other open areas. The consultants suggested that 35 areas are designated as Other Open Land of Townscape Interest (OOLTI), and a further 65 should be put forward for consideration.

[Continued in box to right]

211	118	James Stevens, Home Builders Federation Ltd	Policy LP35: Housing mix and standards	No						<p><u>The adoption of the Nationally Described Space Standard is unsound because it is unjustified in view of the scale of the unmet need.</u></p> <p>The PPG states that when adopting the space standard the local authority should consider the impact of potentially larger dwellings on land supply (PPG, ID 56-020-20150327). The Council has asserted its constraints. We do not doubt that it will be extremely difficult for the Council to accommodate the OAN in full within Richmond’s administrative area because of the significance of some of these constraints. This is recognised within national planning policy (paragraph 14). However in view of the size of the unmet need the adoption of the optional Nationally Described Space Standard is unjustified. The Council will need to allow for the construction of homes at increased densities especially when this could encourage the provision of more affordable homes.</p> <p>We recognise that the London Plan has stipulated compliance with the nationally Described Space Standard. However, Richmond’s Plan only needs to be in general conformity with the London Plan and this is an area where we consider that the Council is justified in dis-applying London Plan policy.</p> <p><u>The specification of an external space standard is unjustified owing to the size of the unmet housing need.</u></p> <p>The Written Ministerial Statement of 25 March 2015 has controlled the proliferation of those standards relating to the “<i>construction, internal layout and performance</i>” of new dwellings. This is to reduce the burdens on developers as a consequence of proliferating local standards in order to “<i>bring forward much needed new homes</i>” (the Written Ministerial Statement). This control does not extend to external space standards. However, in view of the scale of the Council’s unmet need the Council is unjustified in adopting this local standard. The standard should be removed from the Plan to encourage more small sites to come forward, potentially on back garden land, to try and increase supply above the minimum requirement of 315dpa.</p> <p>It should be noted that the stipulation of an external space standard was removed from Crawley’s Local Plan owing to the size of its unmet housing need (5,300 dwellings) and the need to provide opportunities to increase supply to close the gap between need and supply.</p>		<p>Comments noted. It is considered that the adoption of the Nationally Described Space Standard is justified taking account of need and viability - including affordability. The London Plan approach to the provision of quality homes is clear, to create satisfactory standards of accommodation for future occupiers. Reducing unit sizes is not the only way of increasing densities. The setting of a minimum standard is to prevent sub standard accommodation and does not require larger dwellings. Smaller dwellings could be considered as an exception if sufficiently justified in line with paragraph 9.2.10. No changes required.</p> <p>With reference to the external space standards, the provision for external space standards is considered to be justified to create satisfactory standards of accommodation for future occupiers, recognising the contribution to quality of life and health. This is also important to the character of the borough, and would not preclude small sites and back garden development provided it complies with Policy LP39. Exceptions could be considered if sufficiently justified in line with paragraph 9.2.10. No changes required.</p> <p>It is considered that the Whole Plan Viability research is robust, and takes account of GLA Housing Standards Review Viability Assessment which is more recent and specific to London. No changes required.</p>
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Lastly, the Council does not appear to have factored in the cost of the Nationally Described Space Standard – see paragraph 10.4.16.

The Local Plan specifies that 90% of all new dwellings will be built to Part M4 (2) and that the other 10% will be built to Part M4 (3).

This policy is consistent with the London Plan (examined as the Minor Alterations to the London Plan). We have considered the *Whole Plan Viability Assessment* (December 2016) but it appears that the Council may have under-estimated the cost of this.

Compliance with Part M4 (2) and Part M4 (3) is expensive. We refer the Council to the DCLG report *Housing Standards Review: Cost Impacts* (September 2014). This report was produced by the DCLG to support its Housing Standards Review. The cost of compliance with Part M is prohibitive, especially Part M4 (3) – wheelchair accessible homes. We refer the Council to Table 45. The London Plan acknowledges that complying with Part M4 (3) could be challenging, especially in terms of the construction of flats. We note in paragraph 10.4.6 of the Viability Assessment that the Council has allowed for £10,000 for a flat in a scheme of six. This seems about right. We are more concerned about the figure of £15,000 for a mixed scheme. The DCLG report puts the range of costs between £7,764 and £23,052 depending on dwelling type. The average cost is £16,779. There are also professional processing costs associated with the standard which can range between £1,174 per dwelling for a small development to £4,570 per dwelling on a large scheme.

We note that the viability assessment is predicated on “allocations being in relatively low value employment existing uses” (page 4). This is inconsistent with the Local Plan which prohibits the use of employment sites for housing (Policy LP 41).

251	219	Craig Hatton, Persimmon Homes - Thames Valley	Policy LP35 Housing mix and standards	No		Yes		<p>The adoption of the Nationally Described Space Standard is unsound because it is unjustified in view of the scale of the unmet need.</p> <p>The Council has asserted its constraints and we do not doubt that it will be extremely difficult for the Council to accommodate the OAN in full within Richmond's administrative area because of the significance of some of these constraints. This is recognised within national planning policy (paragraph 14). However in view of the size of the unmet need the adoption of the Nationally Described Space Standard is unjustified.</p>	The Council will need to allow for the construction of homes at increased densities.	Comments noted. It is considered that the adoption of the Nationally Described Space Standard is justified taking account of need and viability - including affordability. The London Plan approach to the provision of quality homes is clear, to create satisfactory standards of accommodation for future occupiers. Therefore, the Mayor of London, as part of the London Plan (policy 3.5), has adopted the Nationally Described Space Standards. Reducing unit sizes is not the only way of increasing densities. The setting of a minimum standard is to prevent sub standard accommodation and does not require larger dwellings. Smaller dwellings could be considered as an exception if sufficiently justified in line with paragraph 9.2.10. No changes required.
333	171	Ziyad Thomas, The Planning Bureau Ltd on behalf of McCarthy & Stone Retirement Lifestyles Ltd	Policy LP 35 Housing Mix and Standards Pages: 119-120 Paragraph: 9.2.1	No		Yes		<p>Policy LP35: Housing Mix & Standards We note and appreciate the Councils intention to create balanced communities and that as part of this there is a need to increase the amount of housing that is suitable for families. Sub-clause A) stipulates 'that development should generally provide family sized accommodation'. This is problematic for providers of specialist older persons' accommodation as they are unable to provide a mix of family housing types 'in block' due to the provision and function of the communal facilities and care services located therein. As such developments are sited on spatially constrained urban sites close to town or local centres then there is rarely scope to provide additional out-of block family housing.</p> <p>We support the inclusion of text in paragraph 9.2.1 that recognises that specialist development for older people frees up existing under occupied housing stock in the area and catalyse housing chains. A report carried out by Shelter in 2012 calculated that nationally if the 20% of older households which are currently under-occupied were to downsize, around 840,000 family sized homes would be released, including 760,000 in the owner occupied sector. McCarthy & Stone find on average around 60% of occupants move into a McCarthy & Stone scheme from within a five mile radius of the site.</p> <p>The wording of Policy LP35 presently does not acknowledge the difficulties of providing a mix of housing types in specialist forms of older persons accommodation. Similarly worded Housing Mix policies elsewhere in London are causing very pressing difficulties for McCarthy & Stone and Council Development Management officers</p>	We respectfully request that the Council amend sub-clause A of Policy LP35 to specifically acknowledge the difficulties of providing family housing in specialist developments or, in light of the ability of such developments to release under occupied housing, exempt them altogether from this requirement.	Comments noted. It is considered that there is flexibility in Policy LP 35, which states that family sized accommodation should generally be provided and that the housing mix should be appropriate to the location. This is adequately addressed in Policy LP 37.B, which would be considered for housing needs of different groups. No changes required.

										who are hamstrung by policy wording which is not sufficiently flexible to function effectively.		
414	73	James Cogan, GL Hearn on behalf of Evergreen Investment Retail Company	Policy: LP 35 Housing Mix and Standards	No					Yes	<p>See also Publication Local Plan Comment ID 409 - for preamble and introductory text to this representation</p> <p>Policy LP 35 - Housing Mix Standards</p> <p>3.23 Our client welcomes the objectives of Policy LP 35 of the Richmond Local Plan which seeks to deliver a mix of housing to meet the objectively assessed housing needs within the borough. In particular our client welcomes the acknowledgement that whereas developments should generally provide family sized accommodation, a higher proportion of small units will be appropriate within the five main centres (including Twickenham).</p> <p>3.24 However our client is concerned that Policy LP 35 requires all new housing developments, including conversions, to comply with the Council's external space standards. The Council's external amenity space standards for flats require 'a minimum of 5sq.m of private outdoor space for 1-2 person dwellings... and an extra 1sq.m should be provided for each additional occupant'. It is strongly contended that the requirement for new residential properties created by way of the conversion of existing properties fails to acknowledge that the provision of external amenity space is not appropriate in all instances (i.e. the conversion of existing buildings that cannot accommodate balconies etc.). Furthermore Policy LP 35 fails to acknowledge that high quality external amenity space can be provided by way of shared communal space and/or existing high quality open space that is within close proximity to the proposed development.</p> <p>3.25 As such it is strongly contended that the rigid application of Policy LP 35 will restrict otherwise appropriate conversions of existing buildings for residential use. Policy LP 35 is therefore not consistent with the overarching objectives of the NPPF which promote the effective and efficient use of previously developed land and existing buildings to meet objectively assessed housing need.</p>		Comments noted. It is considered that the provision for external space standards is justified to create satisfactory standards of accommodation for future occupiers, recognising the contribution to quality of life and health. This is also important to the character of the borough, and does not preclude communal space if it meets the tests in Policy LP35.D. Exceptions could be considered if sufficiently justified in line with paragraphs 9.2.10 and 9.2.11. No changes required.
15	180	Christina Leigh on behalf of Jane Miller	Policy LP36, paragraphs 9.3.1-9.3.12	No	No	Yes		Yes	Yes	<p>Objection is raised to any calculation of affordable housing provision on a 'gross' basis, ie not a 'net' basis. It is unfair not to take into account existing housing numbers on site. The objective of the policy is to increase affordable housing numbers. Paragraph 9.3.2 says 'The policy applies to all new housing development': replacement of an existing house is not 'new' housing development, yet by seeking a gross figure that is the effect of the policy. Paragraph 9.3.2 then provides no detailed justification for the use of a gross figure: it is merely said 'The affordable</p>	<p>Affordable housing policy in Richmond must be consistent with the Ministerial Statement and national planning policy, which states that affordable housing contributions should not be sought from developments providing 10 units or fewer.</p>	<p>Comments noted. It is clear that Policy LP 36 applies to all housing sites and contributions are based on the number of units proposed (gross). This approach is justified by the substantial affordable housing needs. Any viability case can be made to take into account existing use(s). There is no evidence that this stifles new housing provision. No changes required.</p>

housing provision (on-site or off-site) or any financial contribution should be calculated in relation to gross rather than net development i.e. it should be based on the total number of units proposed in the final development.' This approach stifles new housing provision. It means that a proposal for, say, conversion of one dwelling to two flats means a provision towards two affordable dwellings. That is unjust when there is only a net increase of one.

The request is unjustified. Objection is also raised to the provision of affordable housing below the 10 units threshold, in light of policy in the Planning Policy Guidance and the Ministerial Statement of November 2014. This sets out that such a threshold is a circumstance where contributions should not be sought. The rigid criteria in seeking contributions for small sites set out in Policy LP36, when also combined with the 'gross' criterion, has proven to restrict the provision of new housing in the Borough through the Council's rigidity in seeking contributions on small sites.

In respect to the Council's affordable housing shortfall, the Council's justification for a departure from national policy is that they have an "exceptional local need". The Council identify a deficit of 964 affordable houses/annum within the Borough; however there are several Borough's within London which have a greater need than Richmond including Bromley (1,404/annum); Ealing (1,995/annum); Haringey (1,345/annum); Kensington and Chelsea (4,823/annum)⁵; Lewisham (1,144/annum)⁶; Newham (1,110/annum)⁷; and Sutton (1,018/annum). Several Boroughs also have a higher proportion of affordable housing need against their overall need including Barking and Dagenham (119%) Ealing (110%) and Haringey (99%) In terms of past supply, table HPM 4 of the Mayor of London's Annual Monitoring Report (2014-15) shows that on average the number of conventional affordable housing completions for the period 2012/13 – 2014/15 in Richmond was 22%. This completion rate is only 3% below the total London average (25%) and there are several Boroughs that have a comparable or lesser overall completion rate than Richmond over the last three years including Bexley (19%); Bromley (-2%); City of London (2%); Ealing (21%); Hammersmith and Fulham (20%); Harrow (26%); Hillingdon (16%); Hounslow (20%); Islington (23%); Kingston (20%); Redbridge (9%); Southwark (25%); Tower Hamlets (23%); and Westminster (13%).

Figures from the GLA show that in 2016 Richmond had the 17th smallest waiting list of all 33 London Boroughs and that their waiting list of 4,908 is less than the average London Borough waiting list of 6,895. As such, the situation in Richmond appears little different to average, and there does not seem to have the exceptional local

In relation to the Written Ministerial Statement (WMS), it should be noted that the Planning Inspectorate has confirmed in correspondence to the Council that the WMS is a material consideration. However, the Inspectorate also confirmed that the development plan can outweigh the relevant parts of the WMS and PPG, if justified by local circumstances: <http://offlinehbpl.hbpl.co.uk/NewsAttachments/RLP/PINSletterPlanningResource.pdf>

The Council's local evidence of affordable housing need is substantial. In this borough, small sites cumulatively make a significant contribution to housing supply. A lower threshold of 10 units or more maximises on-site delivery. The Borough's Strategic Housing Market Assessment (SHMA) (December 2016) demonstrates a net deficit of 964 affordable homes per annum in the borough. In 2014/15, only 2% of the net gain in total completions were affordable, which was a dramatic reduction on the higher percentages achieved in recent years as there were only four large sites completed, all through prior approvals (office to residential), so there were no other opportunities to secure on-site provision. While the total affordable housing completions has increased in 2015/16 to 20%, there remained limited opportunities for on-site delivery, with 12 of the 16 sites delivering affordable housing brought forward by a Registered Provider. The latest AMR for 2015/16 continues to demonstrate sufficient five year housing land supply totalling 2096 units, of which 806 units are from small sites. Therefore, it is evident that the Council's approach towards requiring affordable housing from all sites (a policy that has been implemented since 2012) has not hindered housing delivery. However, as the supply of large sites fluctuates and in some years completions from large sites have fallen as low as 7%,

circumstances in terms of affordable housing need as suggested.

Richmond's Annual Monitoring Report (2016 Review of Core Strategy and Development Management Plan Policies: produced to support the Local Plan Consultation) shows that of their five year housing supply, 49% comes forward on small sites. The fact that the Council can demonstrate a five year housing land supply is in itself an indication that housing is coming forward within the Borough. But of particular relevance is that the proportion of overall future supply from small sites (49%) is comparable with many London Boroughs, several of which rely more heavily on small site capacity including Bromley (54%); Merton (51%); Islington (52%); City of London (45%); Hackney (45%); Sutton (45%). Again, this indicates that Richmond does not have exceptional circumstances in this respect.

Completions from large sites have also fluctuated. The Monitoring Report refers to these falling as low as 7%, but shows that the majority of housing completions in the borough have come from large sites in 7 of the past 12 years, with the proportion of large site completions as high as 83% on two separate occasions (2012/13 was 83% and 2013/14 was 73%).

The Council are seeking to impose an affordable housing requirement with no threshold, contrary to the Written Ministerial Statement, reaffirmed as policy by the Court of Appeal judgement of May 2016. There is not any exceptional local need that justifies this, when compared to other London Boroughs in respect to their affordable housing need, past supply, or their reliance on small site capacity. The change in national policy outlined in the WMS was intended 'to tackle the disproportionate burden of developer contribution on small scale developers'. The WMS considers that 'By lowering the construction cost of small-scale new build housing and home improvements, these reforms will help increase housing supply. In particular, they will encourage development on smaller brownfield sites and help to diversify the house building sector by providing a much needed boost to small and medium-sized developers, which have been disproportionately affected by the Labour Government's 2008 housing crash.' The Council's proposed policy is therefore inconsistent with National Policy, not justified and is unsound.

the Council remains reliant on small site contributions to meet affordable housing policy objectives. The Council's AMR identifies on average 179 net completions on small sites per annum, which form a significant contribution towards the Council's current housing target of 315. Therefore, the exceptional local need and evidence base support the continued implementation of the Council's policy, which requires contributions to affordable housing provision from all housing sites. This approach is in accordance with paragraph 10 of the NPPF, which states that Local Plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas. In accordance with LP 36, the Council will continue to consider reducing planning obligations if fully justified through financial viability evidence, so that the impact of the policy does not restrict future housing delivery on small sites. No changes required.

212	118	James Stevens, Home Builders Federation Ltd	Policy LP36: Affordable housing	No	Yes	<p><u>The requirement for 50% affordable housing on sites of ten or more units is unsound because it has not been tested for viability. As such the policy has not been prepared in conformity with national policy and it may be unjustified.</u></p> <p>The <i>Whole Plan Viability Assessment</i> has only tested 40% affordable Housing (paragraph 12.3). This is also apparent from the appendices. The requirement is unjustified. This is an elementary issue of viability appraisals. Paragraph 173 of the NPPF makes this clear.</p> <p><u>The requirement that sites of ten or more units provide 50% affordable housing is contrary to national policy which exempts schemes of “ten or more dwellings” from affordable housing obligations.</u></p> <p>The Council will need to re-draft the policy to properly reflect the national policy, as articulated in the Written Ministerial Statement of 28 November 2014.</p> <p><u>The requirement that sites of fewer than ten units make financial contributions is contrary to national planning policy which exempts schemes of “ten or more dwellings” from affordable housing obligations.</u></p> <p>The Council will need to re-draft the policy to properly reflect the national policy, as articulated in the Written Ministerial Statement of 28 November 2014. It is unclear what justification the Council has for dis-applying the national policy in the case of schemes involving 10 or fewer dwellings, or with a combined gross floor space that does not exceed 1,000 square metres.</p> <p><u>Tenure mix</u></p> <p>The Council proposes that 40% of the affordable housing element will be provided as ‘rent’ and 10% as ‘intermediate’. It does not say in what form the other 50% of the affordable housing element should be provided. Also the Plan needs to specify what it means by ‘rent’. Is this social rent or affordable rent? Local Plan policies need to be clear to guide applicants and decision-takers (NPPF, paragraphs 15, 17 and 154).</p> <p>Notwithstanding this confusion, we note that the <i>Whole Plan Viability Assessment</i> is unclear about the tenure mix that has been assumed. We have found this difficult to glean from the main report and the appendices. The Council, should as a matter of principle, model the tenure split that it proposed in the Local Plan.</p>	<p>Comments noted. No changes required. LP 36 states that the Council will “seek the maximum reasonable amount of affordable housing”, and that the Council will have regard to economic viability. Moreover, in relation to schemes of less than 10 units where there is no loss of employment, the policy seeks a financial contribution in lieu of on-site provision based on a sliding scale. This ranges from 5% for single dwelling schemes to 45% for developments of nine homes, or less for conversions. On other sites the policy expects a greater amount of affordable housing, where there is a loss of affordable housing or if delivered on sites by a Registered Provider. Considering this, the development plan's requirements for affordable housing are less clear cut than a single percentage. Schemes recently granted permission have achieved a range of percentages. In the context of all this, the 40% assumed in the Whole Plan Viability Assessment can be considered reasonable and appropriate, and the policy requirements for affordable housing are adequately reflected. It should be noted that where affordable housing contributions are shown through an assessment to render schemes unviable, then exceptions to the policy are allowed. This introduces a clear element of flexibility. Note that the exact approach of testing at 40% was supported in the Examiner's Report on the Examination of the Draft Richmond upon Thames Community Infrastructure Levy Charging Schedule (2014).</p>
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220	239	Dean Jordan, DP9 on behalf of Richmond Athletic Association	Affordable Housing LP 36							<p>Policy LP 36 notes that 50% of all units will be affordable housing, with a tenure mix of 40% housing for rent and 10% intermediate housing. Although the need for affordable housing is acknowledged by our client the 50% target is seen to be unrealistic given that the Council has failed to achieve anywhere near this level in the last 10 years. According to the Council's 2014/2015 Annual Monitoring Report, the average level of affordable housing achieved over the last 5 years was circa 25.4%. We suggest that the affordable housing percentage is revised to reflect a realistic and achievable target of 35%, subject to viability.</p> <p>The second part of the policy notes that on sites below the threshold of "<i>capable of ten or more units gross</i>" a financial contribution to the Affordable Housing Fund commensurate with the scale of development, will be sought. This is contrary to the order of the Court of Appeal dated 13 May 2016, which gives legal effect to the policy set out in the written ministerial statement of 28th November 2014 which states that "<i>due to the disproportionate burden of developer contributions on small-scale developers, for sites of 10-units or less, and which have a maximum combined gross floor space of 1,000 square metres, affordable housing and tariff style contributions should not be sought. This will also apply to all residential annexes and extensions.</i>" We request that this is removed from the draft Local Plan.</p>		<p>Comments noted. It is considered that a strategic borough-wide target of 50% is justified by the substantial affordable housing needs. No changes required.</p> <p>In relation to the Written Ministerial Statement (WMS), it should be noted that the Planning Inspectorate has confirmed in correspondence to the Council that the WMS is a material consideration. However, the Inspectorate also confirmed that the development plan can outweigh the relevant parts of the WMS and PPG, if justified by local circumstances: http://offlinehbpl.hbpl.co.uk/NewsAttachments/RLP/PINSletterPlanningResource.pdf</p> <p>The Council's local evidence of affordable housing need is substantial. In this borough, small sites cumulatively make a significant contribution to housing supply. A lower threshold of 10 units or more maximises on-site delivery. The Borough's Strategic Housing Market Assessment (SHMA) (December 2016) demonstrates a net deficit of 964 affordable homes per annum in the borough. In 2014/15, only 2% of the net gain in total completions were affordable, which was a dramatic reduction on the higher percentages achieved in recent years as there were only four large sites completed, all through prior approvals (office to residential), so there were no other opportunities to secure on-site provision. While the total affordable housing completions has increased in 2015/16 to 20%, there remained limited opportunities for on-site delivery, with 12 of the 16 sites delivering affordable housing brought forward by a Registered Provider. The latest AMR for 2015/16 continues to demonstrate sufficient five year housing land supply totalling 2096 units, of which 806 units are from small sites. Therefore, it is evident that the Council's approach towards requiring affordable housing from all sites (a policy that has been implemented since 2012)</p>
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252	219	Craig Hatton, Persimmon Homes - Thames Valley	Policy LP36 Affordable housing		No				Yes	The requirement for 50% affordable housing on sites of ten or more units is unsound because it has not been tested for viability. As such the policy has not been prepared in conformity with national policy and it may be unjustified.	There is little justification for this level of affordable housing and further viability testing should be undertaken as part of this process.	Comments noted. No changes required. LP 36 states that the Council will “seek the maximum reasonable amount of affordable housing”, and that the Council will have regard to economic viability. Moreover, in relation to schemes of less than 10 units where there is no loss of employment, the policy seeks a financial contribution in lieu of on-site provision based on a sliding scale. This ranges from 5% for single dwelling schemes to 45% for developments of nine homes, or less for conversions. On other sites the policy expects a greater amount of affordable housing, where there is a loss of affordable housing or if delivered on sites by a Registered Provider. Considering this, the development plan's requirements for affordable housing are less clear cut than a single percentage. Schemes recently granted permission have achieved a range of percentages. In the context of all this, the 40% assumed in the Whole Plan Viability Assessment can be considered reasonable and appropriate, and the policy requirements for affordable housing are adequately reflected. It should be noted that where affordable housing contributions are shown through an assessment to render schemes unviable, then exceptions to the policy are allowed. This introduces a clear element of flexibility. Note that the exact approach of testing at 40% was supported in the Examiner's Report on the Examination of the Draft Richmond upon Thames Community Infrastructure Levy Charging Schedule (2014).
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263	10	Caroline Wilberforce, Indigo Planning on behalf of Ashill Land Limited	Policy: LP 36 Affordable Housing	No			Yes	<p>We act on behalf of Ashill Land Limited and write in response to the above consultation. We welcome the opportunity to comment upon the policies and allocations set out in the Publication version of the Local Plan.</p> <p>Background</p> <p>Ashill Land Limited owns a site at 9 Tudor Road and 27 Milton Road in Hampton, Richmond, TW12 2NH. Historically the site and its buildings were used for car sales and car repairs/servicing, however, all commercial operations ceased back in 2011.</p> <p>Following positive pre-application discussions with officers, a planning application (reference: 16/3019/FUL) was submitted in July 2016 for the redevelopment of this site to provide seven family dwellings.</p> <p>The principle of residential redevelopment of the site has been accepted by officers and the application is due to be reported to the Planning Committee on 22 March for a decision.</p> <p>Indigo Planning has previously submitted representations on behalf of Ashill Land Limited to the “Scope and Rationale for Review of Planning Policies (Core Strategy 2009 and Development Management Plan 2011), together with the Emerging site Allocations”, the “Pre-publication Consultation Version of the Local Plan” and the “Hampton draft Village Planning Guidance”, all in relation to this site.</p> <p>Purpose of representations</p> <p>In accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012, local planning authorities are required to make a copy of each of the proposed submission documents available under Regulation 19.</p> <p>The purpose of a consultation under Regulation 19 is to ensure that the proposed submission documents have been prepared in accordance with the Duty to Cooperate, legal and procedural requirements and whether it is sound. NPPF paragraph 182 considers a plan “sound” if it is:</p> <ul style="list-style-type: none"> • Positively prepared – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; • Justified – the plan should be the most appropriate 	<p>We maintain that Policy LP36 should be amended so that it reflects National Planning Guidance.</p>	<p>Comments noted. No changes required. It should be noted that 16/3019/FUL was granted permission on 7 April 2017. Following consideration of viability evidence, it was agreed that the proposed scheme was not viable and could not provide any affordable housing contribution.</p> <p>In relation to the Written Ministerial Statement (WMS), it should be noted that the Planning Inspectorate has confirmed in correspondence to the Council that the WMS is a material consideration. However, the Inspectorate also confirmed that the development plan can outweigh the relevant parts of the WMS and PPG, if justified by local circumstances: http://offlinehbpl.hbpl.co.uk/NewsAttachments/RLP/PINSletterPlanningResource.pdf</p> <p>The Council’s local evidence of affordable housing need is substantial. In this borough, small sites cumulatively make a significant contribution to housing supply. A lower threshold of 10 units or more maximises on-site delivery. The Borough’s Strategic Housing Market Assessment (SHMA) (December 2016) demonstrates a net deficit of 964 affordable homes per annum in the borough. In 2014/15, only 2% of the net gain in total completions were affordable, which was a dramatic reduction on the higher percentages achieved in recent years as there were only four large sites completed, all through prior approvals (office to residential), so there were no other opportunities to secure on-site provision. While the total affordable housing completions has increased in 2015/16 to 20%, there remained limited opportunities for on-site delivery, with 12 of the 16 sites delivering affordable housing brought forward by a Registered Provider. The latest AMR for 2015/16 continues to demonstrate sufficient five year housing land supply totalling 2096 units, of which 806 units are from small</p>
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									<p>strategy, when considered against the reasonable alternatives, based on proportionate evidence;</p> <ul style="list-style-type: none"> • Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and • Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. <p>These representations demonstrate that the Council’s approach to its housing target is unsound and that Policies LP36 and LP40 are unsound.</p> <p>We note that the Publication Local Plan was adopted for development management purposes at a Cabinet Meeting of 13 December 2016.</p> <p><u>Unsoundness of Policy LP36</u></p> <p>Policy LP36 of the Publication Local Plan requires a contribution to affordable housing on all sites. On sites capable of ten or more units and all former employment sites, the Council expects at least 50% on-site provision. On sites below ten units, a financial contribution to the Affordable Housing Fund is required.</p> <p>However, for a plan to be sound it should be in accordance with national planning policy. The Written Ministerial Statement (WMS) published on 28 November 2014 states that affordable housing is not required on sites of 10 units or less and which have a maximum combined gross floorspace of no more than 1000sqm.</p> <p>This WMS is a significant material consideration following a Court of Appeal judgement on 11 May 2016 and Planning Policy Guidance has been subsequently updated to reflect this decision. It is therefore evident that Policy LP36 is not in accordance with national planning policy and is therefore unsound.</p>	<p>sites. Therefore, it is evident that the Council’s approach towards requiring affordable housing from all sites (a policy that has been implemented since 2012) has not hindered housing delivery. However, as the supply of large sites fluctuates and in some years completions from large sites have fallen as low as 7%, the Council remains reliant on small site contributions to meet affordable housing policy objectives. The Council’s AMR identifies on average 179 net completions on small sites per annum, which form a significant contribution towards the Council’s current housing target of 315. Therefore, the exceptional local need and evidence base support the continued implementation of the Council’s policy, which requires contributions to affordable housing provision from all housing sites. This approach is in accordance with paragraph 10 of the NPPF, which states that Local Plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas. In accordance with LP 36, the Council will continue to consider reducing planning obligations if fully justified through financial viability evidence, so that the impact of the policy does not restrict future housing delivery on small sites. No changes required.</p>		
290	255	Tanja El Sanadidy, Indigo Planning Ltd on behalf of Shepherd Enterprises Ltd	Policy: LP 36 Affordable Housing	No	No				Yes	<p>We are writing on behalf of our client, Shepherd Enterprises Limited, to make representation in respect of the Council’s second consultation on the draft Local Plan (Publication). Shepherd Enterprises Limited is the owner of the land at 1D Becketts Place, Hampton Wick, KT1 4EW.</p> <p>We previously objected to the “<i>consultation on scope of review of policies and draft site allocations</i>” (letter dated 1 February 2016), and to the council’s first consultation (letter dated 19 August 2017). We continue to express our objection to:</p>	<p>Affordable housing contributions should no longer be required on small sites in light of the changes to Government policy. This has been reiterated in a recent Appeal Decision (attached) within the London Borough of Richmond. Therefore, this requirement should be removed from policy.</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 second consultation on the draft Local Plan (Publication).</p> <p>We would appreciate confirmation that the representation</p>	<p>Comments noted. It should be noted that the Planning Inspectorate has confirmed in correspondence to the Council that the Written Ministerial Statement (WMS) is a material consideration. However, the Inspectorate also confirmed that the development plan can outweigh the relevant parts of the WMS and PPG, if justified by local circumstances: http://offlinehbpl.hbpl.co.uk/NewsAttachments/RLP/PINSletterPlanningResource.pdf</p>

	<p>- Policy LP 36 (Affordable housing) and the requirement of a financial contribution on small sites; and - Site allocation policies LP 25 (Development Centres) and LP 41 (Offices).</p> <p>The consultation form is included with this letter. We have set out our justification below.</p> <p>Policy LP 36 Affordable Housing</p> <p>This policy states (under B.b.) that a contribution towards affordable housing will be expected <i>“on sites below the threshold of ‘capable of ten or more units gross’ and all former employment sites (...) a financial contribution to the Affordable Housing Fund commensurate with the scale of development in line with the...Affordable Housing SPD”</i>. This policy is not in line with national planning guidance as set out below.</p> <p>In 2016, the government reintroduced national planning guidance in relation to affordable housing thresholds and financial contributions. For residential schemes under 10 units, Paragraph 020 of the National Planning Policy Guidance (PPG) states that, <i>“for sites where a threshold applies, planning obligations should not be sought to contribute to affordable housing or to pooled funding ‘pots’ intended to fund the provision of general infrastructure in the wider area”</i>. The intention of the policy is to help ensure the delivery of more small housing sites.</p> <p>This affordable housing exception, subject of the Written Ministerial Statement (WMS), dated 28 November 2014 (including subsequent amendments to Planning Practice Guidance), was challenged by Reading Borough Council and West Berkshire District Council. The Court of Appeal has upheld the Government’s policy, and the policy was reintroduced into the PPG on 19 May 2016.</p> <p>Given the fact that this is now national policy, it is a material consideration and should be afforded significant weight in Plan-making in line with the NPPF.</p> <p>This fundamental change has been further reiterated in many recent appeal decisions and is subject to the current public debate, as the following Inspector’s statements demonstrate:</p> <p><u>Appeal Decision (ref. APP/L5810/W/16/3143164) for 39 Second Cross Road, Twickenham, TW2 5QY</u></p>	<p>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>	<p>The Council’s local evidence of affordable housing need is substantial. In this borough, small sites cumulatively make a significant contribution to housing supply. A lower threshold of 10 units or more maximises on-site delivery. The Borough’s Strategic Housing Market Assessment (SHMA) (December 2016) demonstrates a net deficit of 964 affordable homes per annum in the borough. In 2014/15, only 2% of the net gain in total completions were affordable, which was a dramatic reduction on the higher percentages achieved in recent years as there were only four large sites completed, all through prior approvals (office to residential), so there were no other opportunities to secure on-site provision. While the total affordable housing completions has increased in 2015/16 to 20%, there remained limited opportunities for on-site delivery, with 12 of the 16 sites delivering affordable housing brought forward by a Registered Provider. The latest AMR for 2015/16 continues to demonstrate sufficient five year housing land supply totalling 2096 units, of which 806 units are from small sites. Therefore, it is evident that the Council’s approach towards requiring affordable housing from all sites (a policy that has been implemented since 2012) has not hindered housing delivery. However, as the supply of large sites fluctuates and in some years completions from large sites have fallen as low as 7%, the Council remains reliant on small site contributions to meet affordable housing policy objectives. The Council’s AMR identifies on average 179 net completions on small sites per annum, which form a significant contribution towards the Council’s current housing target of 315. Therefore, the exceptional local need and evidence base support the continued implementation of the Council’s policy, which requires contributions to affordable housing provision from all housing sites. This approach is in accordance with</p>
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									<p>At para. 25 of the Appeal Decision, the Inspector concludes that a financial contribution is no longer required in light of the change in Government policy. The paragraph reads:</p> <p><i>“The approach set out within the WMS, which is reiterated in the PPG, provides clarification on national policy and is to be read alongside the Framework. The WMS is therefore a significant material consideration in the determination of this appeal. The proposal conflicts with policy DM HO 6 in that it makes no contribution towards local affordable housing provision. Notwithstanding this, the conflict is outweighed by the change in Government policy on affordable housing contributions, as set out in the WMS. On that basis, I consider that a contribution towards affordable housing is no longer required.”</i></p> <p><u>Appeal Decision (ref. APP/L5810/W/16/3148614) for 11 Tayben Avenue, Twickenham, Richmond upon Thames, TW2 7RA</u></p> <p>At para. 20 of the Appeal Decision, the Inspector concludes as follows:</p> <p><i>“(…) an affordable housing contribution in respect of two units would not be required, notwithstanding any local need for affordable housing identified by the Council. Indeed, I consider it unreasonable for the Council to suggest otherwise.”</i></p> <p>In light of changed Government policy and recent appeal decisions, we object to the requirement of a financial contribution within Policy LP 36 (point B.b) for small sites, which should therefore be removed. This also includes thresholds given within the table in policy LP 36 for the affordable housing contributions for conversions and reversions, new build development and former employment land.</p> <p>It should also be noted that the Affordable Housing SPD (March 2014) is out dated and not in line with national policy guidance.</p> <p>See Appendix 20 in this document for the both appeal decisions referenced above.</p>	<p>paragraph 10 of the NPPF, which states that Local Plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas. In accordance with LP 36, the Council will continue to consider reducing planning obligations if fully justified through financial viability evidence, so that the impact of the policy does not restrict future housing delivery on small sites. No changes required.</p>
313	189	Shaun Lamplough, Mortlake with East	LP 36 Affordable Housing Page 121, Item A						<p>It is noted that the Council expects 50% of all housing units to be affordable housing with a tenure mix of 40% for housing rent and 10% intermediate housing.</p>	<p>Comments noted. No changes required.</p>

		Sheen Society																	
320	214	Harry Spawton, Gerald Eve on behalf of Jonathan Smith, Penney Limited	LP 36 Affordable Housing Paragraphs: 9.31 - 9.312 Pages: 121-124	No					Yes	<p>On behalf of our client Penney Limited, we set out below an objection to Policy LP36 of the London Borough of Richmond-upon-Thames Local Plan Review Publication Draft (LPRP).</p> <p>Background</p> <p>The LPRP is out for further public consultation, before it is formally submitted to the Secretary of State for its Examination in Public. Comments are sought in relation to the 'Duty to Cooperate' and 'Soundness'.</p> <p>Prior to the current consultation on the LPRP, a previous consultation was undertaken for the pre-publication draft between the 8 July 2016 and 19 August 2016. As part of that consultation there were a number of unresolved objections to emerging Policy LP36 but no amendments seem to have been made.</p> <p>Planning Guidance</p> <p>The National Planning Policy Framework (NPPF) (2012) sets out at paragraph 182 the 4 tests that need to be met in order for a Local Plan to be considered 'Sound'. The 4 tests are that the Plan must be:</p> <ul style="list-style-type: none"> - Positively Prepared; - Justified; - Effective; and, - Consistent with national planning policy. <p>To support the tests within the NPPF the Planning Advisory Service (PAS) has issued a Soundness Self-Assessment Checklist (2014) (Appendix A). The checklist states that to be consistent with national planning policy:</p> <p><i>"The Development Plan Document (DPD) should not contradict or ignore national planning policy. Where there is a departure, there must be clear and convincing reasons to justify the approach taken."</i> (Page 18)</p> <p>The latest expression of national policy relating to planning obligations is established within the Planning Practice Guidance (PPG). The PPG makes clear when planning obligations or tariff-style contributions should be sought, stating, <i>inter alia</i>:</p> <p><i>"Contributions should not be sought from development of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres."</i></p>	We request that Part B b) be removed in its entirety.	<p>Comments noted. It should be noted that the Planning Inspectorate has confirmed in correspondence to the Council that the Written Ministerial Statement (WMS) is a material consideration. However, the Inspectorate also confirmed that the development plan can outweigh the relevant parts of the WMS and PPG, if justified by local circumstances:</p> <p>http://offlinehbpl.hbpl.co.uk/NewsAttachments/RLP/PINSletterPlanningResource.pdf</p> <p>The Council's local evidence of affordable housing need is substantial. In this borough, small sites cumulatively make a significant contribution to housing supply. A lower threshold of 10 units or more maximises on-site delivery. The Borough's Strategic Housing Market Assessment (SHMA) (December 2016) demonstrates a net deficit of 964 affordable homes per annum in the borough. In 2014/15, only 2% of the net gain in total completions were affordable, which was a dramatic reduction on the higher percentages achieved in recent years as there were only four large sites completed, all through prior approvals (office to residential), so there were no other opportunities to secure on-site provision. While the total affordable housing completions has increased in 2015/16 to 20%, there remained limited opportunities for on-site delivery, with 12 of the 16 sites delivering affordable housing brought forward by a Registered Provider. The latest AMR for 2015/16 continues to demonstrate sufficient five year housing land supply totalling 2096 units, of which 806 units are from small sites. Therefore, it is evident that the Council's approach towards requiring affordable housing from all sites (a policy that has been implemented since 2012) has not hindered housing delivery. However, as the supply of large sites fluctuates and in some years completions from large sites have fallen as low as 7%,</p>							

(Paragraph 031; Reference ID:23b-011-20160519)

Policy LP36 Affordable Housing

Policy LP36 as currently drafted at Part B states:

“A contribution towards affordable housing will be expected on all housing sites:

a. On site capable of ten or more units gross and all former employment sites, at least 50% on-site provision. Where possible, a greater population than 50% affordable housing on individual sites should be achieved.

b. On site below the threshold of ‘capable of ten or more units gross’, a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out below and in the Affordable Housing SPD. “

The justification text of Policy LP36 (paras. 9.3.1 – 9.3.12) sets out the Council’s acute affordable housing need, and the need for small sites to contribute to the delivery of affordable housing, as a reason for advancing a policy that clearly contradicts the national guidance contained in PPG.

However, the Council’s position is not supported by a recent Appeal decision in Richmond-upon-Thames (APP/L5810/W/16/3152828 - **Appendix B**). In that case the Inspector is clear on the issue of Richmond’s local circumstances not being sufficient to set aside Central Government advice in PPG, and states:

“In June 2016, the Council resolved to continue to require Affordable Housing contributions from all sites, through the application of emerging Policy LP36 of its Pre-Publication Local Plan (PPLP). The justification given by the Council for this approach is the substantial need for affordable housing in the area and the significant contribution made to housing supply in the borough by small sites. However, these are not exceptional circumstances supported by the WMS or PPG. The only identified exception to the 10-unit threshold relates to development in designated rural areas where the local planning authority has chosen to apply a lower threshold.” (Paragraph 15)

The Inspector in his response has addressed the issue of Richmond’s local circumstances and the application of Central Government guidance contained in the PPG. He is clear that Richmond’s local circumstance in relation to affordable housing does not outweigh the more up-to-date guidance from Central Government in relation to

the Council remains reliant on small site contributions to meet affordable housing policy objectives. The Council’s AMR identifies on average 179 net completions on small sites per annum, which form a significant contribution towards the Council’s current housing target of 315. Therefore, the exceptional local need and evidence base support the continued implementation of the Council’s policy, which requires contributions to affordable housing provision from all housing sites. This approach is in accordance with paragraph 10 of the NPPF, which states that Local Plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas. In accordance with LP 36, the Council will continue to consider reducing planning obligations if fully justified through financial viability evidence, so that the impact of the policy does not restrict future housing delivery on small sites. No changes required.

										affordable housing provision.		
										<p>On this basis, we strongly object to the Council's retention of the wording used in Part B b) of emerging Policy LP 36. It is not consistent with national planning policy and cannot be considered "sound".</p> <p>See Appendix 15 of this document for Appendix A and B as referenced above</p>		
304	237	Neil Henders on, Gerald Eve LLP on behalf of Reselton Properties Ltd	Policy LP 36 Affordable Housing	No	No	Yes			Yes	<p>See also Publication Local Plan Comment ID 294</p> <p><u>Economic Viability</u></p> <p>We note that the Council's response contains a response with regard to our previous comments raised with respect of the approach to economic viability. Our points set out below are in response to the Council's response on this point.</p> <p>We agree that the Council should have regard to PPG for the determination of Site Value (Benchmark Land Value). The Council's response rightly quotes from paragraph 023 of PPG which indeed requires land or Site Value to:</p> <p>- "reflect policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge;</p> <p>- provide a competitive return to willing developers and land owners (including equity resulting from those wanting to build their own homes); and</p> <p>- be informed by comparable, market-based evidence wherever possible. Where transacted bids are significantly above the market norm, they should not be used as part of this exercise."</p> <p>In its response to our earlier comments, the Council has not referenced the second two bullet points of PPG, only the first. PPG is clear that the assessment of Site Value will vary from case to case. Furthermore, in the assessment of Site Value there are three key considerations of which planning policy is just one. This matter was highlighted in the Parkhurst Road (2015) and King Street appeal decisions (Appeal refs: APP/V5570/A/14/2227656 and APP/H5390/A/13/2209347) where the respective Inspectors acknowledged how the market would approach the value of sites for development in adopting alternative methods of valuation and competition for land. Should the emerging guidance be trying to vary from PPG this would create uncertainty and would potentially result in it being unsound.</p>		<p>Comments noted. The policy is consistent with the Mayor's Draft Affordable Housing and Viability SPG as well as the London Borough Viability Protocol.</p> <p>It is considered that the approach to EUV+ is justified as the LP 36 states in most circumstances. Recent research published by RICS found that the 'market value' approach is not being applied correctly and "if market value is based on comparable evidence without proper adjustment to reflect policy compliant planning obligations, this introduces a circularity, which encourages developers to overpay for site and try to recover some or all of this overpayment via reductions in planning obligations". This is inconsistent with the requirements of PPG. In those circumstances a market value approach will generally not be acceptable. An alternative approach may be justified to market value where an applicant demonstrates that the value properly reflects policy requirements and take account of site specific circumstances. No changes required.</p>

It is an established land valuation principle that utilizing EUV+ for the purposes of benchmark land value or Site Value can often inaccurately value land as it is not based on market evidence. On this precise point the RICS GN 'Financial Viability in Planning' states:

"One approach has been to exclusively adopt current use value (CUV) plus a margin or a variant to this, i.e. existing use value (EUV) plus a premium. The problem with this singular approach is that it does not reflect the workings of the market as land is not released at CUV or CUV plus a margin (EUV plus)."

The approach favoured by the Council therefore ignores the market, is inconsistent with Planning Practice Guidance ('PPG') and is in conflict with the National Planning Policy Framework ('NPPF') which sets out a requirement for competitive returns to willing landowners and willing developers to enable development to be deliverable. An over-reliance on EUV+ across all sites in the Borough is therefore likely to prevent some sites being delivered, particularly those sites with low EUVs (see below for further detail).

A further, established criticism of EUV+ is that there is no consensus on how practitioners are to arrive at an appropriate premium. Such premiums are purely arbitrary and cannot be market tested. This is a further reason why EUV+ is flawed and no in accordance with PPG para. 023.

The correct basis for the assessment of Site Value that is in accordance with the NPPF and PPG is as set out in the RICS Guidance Note. This is evidenced in recent planning appeal decisions, including the King Street decision and Parkhurst Road. The RICS GN states:

"Site value should equate to the Market Value subject to the following assumption: that the value has regard to development plan policies and all other material planning considerations and disregards that which is contrary to the development plan."

We note that the Council's response is referencing research undertaken by Neil Crosby and Peter Wyatt and published by the RICS in 2015 as "Financial Viability Appraisal in Planning Decisions: Theory and Practice" (FVA Research 2015). The Council is highlighting "**identified flaws in the application of the Market Value approach**" of the RICS GN (2012) and in particular "**circularity**" which is purported to encourage developers to overpay for sites.

The Council has not noted that the FVA Research 2015 does in factor consider EUV+ to be at best a 'blunt instrument' and at worst inappropriate for arriving at Site Value. The FVA Research 2015 states:

"In early cases, one approach was to adopt EUV plus a premium to persuade landowners to release the land. However, this takes no account of the substantial variations in the uplift from EUV to RLV. For example, a planning consent to allow residential development on a greenfield site can generate a very large uplift in land value whereas a consent to change the use of a brownfield site from commercial to residential land use might generate a much smaller uplift from EUV. The greenfield site would require very substantial premiums to persuade a landowner to sell. In a number of the appeal cases, EUV was above RLV even before any planning obligations were deducted. In these cases no planning obligations were required. Effectively the EUV plus a premium approach is confounded by the heterogeneity of development sites" (Our emphasis).

The FVA Research 2015 concludes:

"A possible solution lies in the use of existing use value but, if that is no related to the development in any way, it becomes a very blunt instrument that takes no account of a landowner's perspective when deciding to bring a site forward for development." (Our emphasis).

It follows that contrary to the Council's preference for EUV+, the FVA Research 2015 notes the flaws in the application in both over and under valuing, land and property, and the arbitrary nature of the "plus" element. This is due to a lack of relationship with the development in anyway and therefore the market. The RICS GN identifies the same issue at paragraph 3.4.1 where it states:

"...The problem with this singular approach is that it does not reflect the workings of the market as land is not released at CUV or CUV plus (EUV plus). The margin mark-up is also arbitrary and often inconsistently applied..."

RICS GN paragraph 3.4.3 states:

"The residual land value (ignoring any planning obligations and assuming planning permission is in place) and current use value represent the parameters within which to assess the level of any planning obligations. Any

planning obligations imposed will need to be paid out of this uplift but cannot use up the whole of this difference, other than in exceptional circumstances, as that would remove the likelihood of the land being released for development."

EUV therefore represents the lowest value a site would sell for development. The amount paid in excess of this figure needs to reflect for the landowner. Unless the uplift over CUV/EUV is at a level that is acceptable as a competitive return to the landowner it is unlikely that the land would be released for development.

The RICS GN does seek to show how EUV+ can be reconciled with Site Value and how it can be considered consistent with the "competitive return" to the willing seller as set out in the NPPF and PPG. Having identified the Site Value benchmark by reference to market based comparable evidence which is not significantly above the market norm and reflecting policy (thereby complying with all three limbs of the PPG - paragraph 023), the competitive return to the willing seller can be disaggregated into its "EUV" and "plus" components. The RICS GN notes that practitioners will see significant variance in the "plus" element, a point which is echoed in the FVA Research 2015. Even the EUV of the site as noted by the RICS GN and FVA Research 2015 cannot by definition reflect the planning status of the land/property. It follows that the components of "EUV" and "Plus" are notional in calculating the competitive return to the willing land owner but in aggregate can be reconciled with a Site Value.

Assessing what this uplift should be is complex and will vary from site to site and scheme to scheme. The approach of quoting a percentage uplift over EUV stemmed from a number of planning appeal decisions between 2007 and 2009, which were specific to those schemes and market conditions. These pre-date the NPPF and the PPG and as such are not up to date. The sites in each appeal case had relatively high current use values in comparison to development value for residential development and therefore analysis by reference to CUV/EUV appeared to be a convenient way to demonstrate the uplift. However, it was always problematic adopting this approach on greenfield, cleared brownfield or 'sui generis' sites because of the lack of connection between CUV in these circumstances and the potential development land value.

Government guidance emphasizes the need to encourage

										<p>and not restrain development. The requirement for a competitive return for the landowner that reflects planning policy and be informed by comparable, market-based evidence stresses the relevance of market evidence. Unless a benchmark site value assessed as an uplift over CUV/EUV can demonstrate that it comparable, market based, it would not comply with this guidance.</p> <p><i>See Appendix 19 in this document for a copy of their Pre-Publication Consultation Representation submission.</i></p>	
402	169	Brianne Stolper, Greater London Authority on behalf of Mayor of London	Policy: LP 36 Affordable Housing							<p>The Mayor welcomes Richmond's approach to affordable housing provision. He is pleased to see a target for 50% of all housing units to be affordable and particularly supports the approach to seeking a financial contribution to affordable housing provision for small sites. The Mayor is currently consulting on his Affordable Housing and Viability Supplementary Planning Guidance and Local Planning Authorities are strongly encouraged to follow the approach set out in the SPG and introduce a threshold level for viability for (see SPG for detailed guidance).</p> <p><i>See also Publication Local Plan Comment ID 40 for general/supporting comments made by the GLA on the Publication Local Plan, including references to previous correspondence</i></p>	Support welcomed. No changes required.

415	73	James Cogan, GL Hearn on behalf of Evergreen Investment Retail Company	Policy: LP 36 Affordable Housing	No	Yes	<p>See also Publication Local Plan Comment ID 409 - for preamble and introductory text to this representation</p> <p>Policy LP 36 - Affordable Housing</p> <p>3.26 Although our client supports the Council's commitment to meeting housing need within the borough, including the delivery of Affordable Housing to meet objectively assessed needs, our client notes that Policy LP 36 of the Richmond Local Plan fails to acknowledge the Mayor of London's Draft Affordable Housing and Viability SPG.</p> <p>3.27 In this regard the Mayor of London's Draft Affordable Housing and Viability SPG promotes the adoption of an Affordable Housing threshold of 35% of habitable rooms in accordance with the London Plan (2016). Whilst the Draft Affordable Housing and Viability SPG acknowledges that this is not a fixed threshold, paragraph 2.15 of the Draft Affordable Housing and Viability SPG states that local planning authorities should only continue with a higher threshold where they <i>'can demonstrate that it will consistently deliver a higher average through the planning system on nil-grant schemes'</i>.</p> <p>3.28 The Council has not provided any evidence in support of Policy LP 36 that demonstrates that the Council has consistently delivered more than 35% of completions as Affordable Housing units. Indeed, based upon the latest complete monitoring year (2014/15) 304 dwellings were completed within the borough with only 6 of these units (2%) representing Affordable Housing units. Even when those Affordable Housing units created outside of the planning completions (i.e. sites purchased by RSLs etc.) are counted, only 57 Affordable Housing units were delivered in 2014/15, representing just 18.75% of total units completed within the borough in 2014/15.</p> <p>3.29 It is therefore strongly contended that the Council has failed to demonstrate that a 50% Affordable Housing requirement, as promoted within Policy LP 36 of the Richmond Local Plan, will consistently deliver more than a 35% Affordable Housing contribution. Consequently, it is strongly contended that Policy LP 36 is not consistent with the Mayor of London's Draft Affordable Housing and Viability SPG, and should therefore not be considered 'sound'.</p>	Our client therefore suggests that Policy LP 36 be amended to reflect the Mayor of London's Draft Affordable Housing and Viability SPG.	Comments noted. Local Plan policies are required to be in general conformity with the London Plan. The Mayor of London's draft Affordable Housing and Viability SPG was published for consultation on 29 November 2016 to 28 February 2017. The SPG sets out the Mayor's preferred approach and Local Planning Authorities (LPAs) are strongly encouraged to follow this approach for all schemes of ten or more units. It sets out that applications that meet or exceed the 35% threshold without public subsidy, provide affordable housing on site, meet the specified tenure mix and all other requirements and obligations, are not required to submit viability information. It sets out such schemes will be subject to an early review mechanism, but this is only triggered if an agreed level of progress is not made within two years of permission being granted. The Mayor's SPG is a material consideration; however, it cannot alter policy and therefore does not change the London Plan policy requirements. No changes required.
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213	118	James Stevens, Home Builders Federation Ltd	Vacant Building Credit												The Council cannot dis-apply the vacant building credit. We are not convinced that the Council can unilaterally decide to dis-apply the Vacant Building Credit. It cannot dis-apply national policy.		Comments noted. It is considered that the approach as set out in paragraph 9.3.2 is justified by local circumstances. The Mayor's Draft Affordable Housing and Viability SPG states in most circumstances in London it will not be appropriate to apply the Vacant Building Credit. It would be considered on a site by site basis. No changes required.
305	237	Neil Henders on, Gerald Eve LLP on behalf of Reselton Properties Ltd	Policy LP 36 Affordable Housing Paragraph: 9.3.2 (Vacant Building Credit)	No	No	Yes				Yes					<p>See also Publication Local Plan Comment ID 294</p> <p>We also note that draft Policy LP 36 now includes a reference to Vacant Building Credit ('VBC') in the supporting text (para 9.3.2) which was not included in the earlier consultation version of the draft Plan. We appreciate that the Council's stance on VBC is in line with the Mayor's suggested approach as set out within the draft Affordable Housing and Viability SPG (November 2016). However, we would like to point out that currently, the draft SPG and this approach has not been formally adopted and therefore cannot be given material weight. The Mayor's approach is contrary to national policy on VBC as set out within the national PPG. Therefore, whilst there is uncertainty over the direction of VBC both at a national and a regional level, we do not consider it appropriate for local policy to seek to take a stance on the matter.</p> <p>See Appendix 19 in this document for a copy of their Pre-Publication Consultation Representation submission.</p>		Comments noted. It is considered that the approach as set out in paragraph 9.3.2 is justified by local circumstances. The Mayor's SPG is a material consideration. It would be considered on a site by site basis. No changes required.
403	169	Brianne Stolper, Greater London Authority on behalf of Mayor of London	Policy: LP 36 Affordable Housing Paragraph: 9.3.2 Page: 123												The addition of the reference to Vacant Building Credit is [also] welcome. [See also Publication Local Plan Comment ID 40 for general/supporting comments made by the GLA on the Publication Local Plan, including references to previous correspondence]		Support welcomed. No changes required.

334	171	Ziyad Thomas, The Planning Bureau Ltd on behalf of McCarthy & Stone Retirement Lifestyles Ltd	Policy LP 37 Housing Needs of Different Groups Pages: 125-126 Paragraph: 9.4.5-9.4.9	No	Yes	<p>Policy LP37: Housing Needs of Different Groups We commend the Council for acknowledging the need to provide housing for older people in the justification for this policy.</p> <p>In respect of the provision of older persons' accommodation, the Government have set out that its delivery is 'critical. More locally, Annex 5 of the London Plan has recognised the projected increase in the older age cohorts of the population and has corresponding provided an annual target for the delivery of specialist housing for all the London Boroughs. In Richmond there is a requirement for 135 units per annum.</p> <p>The requirement for specialist forms of accommodation detailed in the justification for Policy LP37 falls starkly short of this London Plan's requirement - a combined total of 295 units of specialist older persons' housing across both tenures.</p> <p>We have provided a report (<i>See Appendix 11 to this document</i>) of housing need for specialist accommodation for the elderly in LB Richmond using the Strategic Housing for Older People Analysis Tool (SHOP@) by the Housing Learning and Improvement Networks (Housing LIN). This is a well respected tool as is widely used within both the private and public sector.</p> <p>The Housing LIN provides "Future Market Split" with recommended tenure split settings for Authorities according to the following classifications as; Most Deprived, Deprived, Affluent and Most Affluent. Whilst we appreciate that the Borough does have areas of deprivation, in a national context it is not unreasonable to consider the Authority as 'Most Affluent'. The Shop@ report provided uses the recommended 'Most Affluent' settings for Future Market Split accordingly.</p> <p>The recommended quantum of Extra Care recommends an increase from the current provision 82 units to 370 units by 2020. This is markedly higher than the need for 81 units stipulated by the Council in the Local Plan. Similarly we consider the extent of need for 'sheltered' and 'enhanced sheltered' housing to be similarly underplayed, albeit not to the same extent.</p> <p>We consider that the extent of older persons' housing need had been underplayed in the Local Plan and the quantum of specialist older persons' accommodation falls far short of the requirement detailed in Annex 5 of the London Plan. The Plan cannot be considered sound on that basis.</p>	<p>Policy LP37 Ideally, the evidence base for the quantum of older persons' housing should be re-evaluated to ascertain why the extent of need differs so significantly from that identified in the London Plan and by the Housing LIN. Pragmatically it may be prudent to simply remove the reference to the quantum of the forms of specialist older persons' accommodation in paragraph's 9.4.5 to 9.4.9 and then revisit the Council's evidence base on this matter at a later date.</p>	<p>Comments noted. The Council's research on extra care and the retirement housing review (both available at http://www.richmond.gov.uk/housing_research) alongside the Borough SHMA, have been used to inform a balanced approach to meeting needs for different types of housing and is considered robust. No changes required.</p>
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404	169	Brianne Stolper, Greater London Authority on behalf of Mayor of London	Policy: LP 37 Housing Needs of Different Groups Older people's housing Paragraph: 9.4.5 Page 126							London Plan paragraph 3.50c states that boroughs should demonstrate how they have identified and addressed the local expression of the strategic targets identified for older people in the Plan and that they should work proactively with providers of specialist accommodation to identify and bring forward appropriate sites. It is noted that the Plan highlights its identified requirement for older people's accommodation, however, these are considerably lower than the benchmarks provided in the London Plan and the plan does not appear to include proactive policies to meet this need. [See also Publication Local Plan Comment ID 40 for general/supporting comments made by the GLA on the Publication Local Plan, including references to previous correspondence]	Comments noted. The Council's research on extra care and the retirement housing review (both available at http://www.richmond.gov.uk/housing_research) alongside the Borough SHMA, have been used to inform a balanced approach to meeting needs for different types of housing and is considered robust. No changes required.
214	118	James Stevens, Home Builders Federation Ltd	Policy LP39: Infill, back-land and back-garden development							We would question the justification for this policy in view of the very large unmet housing need. The Council should consider the potential contribution of small sites to helping meet more of the unmet need (for example the Housing White Paper and what it says about small sites). A more permissive policy would be welcome. We recommend that the second paragraph of part B is redrafted to read: <i>"In exceptional circumstances Where it is considered that a limited scale of backgarden development may be acceptable..."</i>	Comments noted. It is considered that the reference to exceptional circumstances is part of the presumption against loss of back gardens and justified by the direct and indirect value of gardens in the borough. This is in accordance with the NPPF which states policies can resist inappropriate development of residential gardens. In addition, this is in accordance with London Plan Policy 3.5, which states that "Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified." No changes required.
416	73	James Cogan, GL Hearn on behalf of Evergreen Investment Retail Company	Policy: LP 39 Infill, Backland and Backgarden Development							See also Publication Local Plan Comment ID 409 - for preamble and introductory text to this representation Policy LP 39 - Infill, Backland and Backgarden Development 3.30 Our client welcomes the objectives of Policy LP 39 of the Richmond Local Plan, which seek to promote the appropriate and effective use of previously developed land to meet the development needs of the borough. Indeed, given the shortage of land for housing development within the borough, and the significant objectively assessed housing need, it is strongly contended that the Richmond Local Plan must promote the effective and efficient use of previously developed land, such as infill and backland development opportunities to meet the development needs of the borough. 3.31 Nonetheless, as previously expressed, our client is concerned by the restrictive nature of Policy LP 8 which will restrict infill and backland development that would otherwise be acceptable under the provisions of Policy LP	Comments noted. It is considered that the policy sets out the appropriate approach to infill and backland development in the context of this borough. See Officer response on Policy LP 8 under Comment ID 411 above.

									39 of the Richmond Local Plan.		
									See Publication Local Plan Comment ID 411		
193	289	Tim Rainbird , Quod on behalf of Travis Perkins Plc	LP 40 Employment and the Economy	No					<p>The purpose of these representations is to highlight the important of and therefore the need to protect existing <i>sui generis</i> employment generating uses, specifically builders’ merchants, throughout London including in Richmond.</p> <p>The Test of Soundness</p> <p>The emerging Local Plan fails the test of soundness because it does not comply with national policy as it does not afford protection to this successful local business. The Site does not fall within the traditional B Classes and builders’ merchant is not listed as a protected <i>sui generis</i> employment use in the Local Plan. This is not consistent with national policy which seeks to ensure that Local Plans protect local businesses, stating that Local Plans should:</p> <p>“proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities” (our emphasis)</p> <p>Indeed Paragraph 20 the NPPF seeks to ensure that Local Authorities proactively support the development needs of business and at Paragraph 21 advises that Local Plans should:</p> <p>“support existing business sectors, taking account of whether they are expanding or contracting”</p> <p>The lack of protection afforded to the existing builders’ merchant use risks the loss of the existing use and allows for a complete redevelopment of the site for non-employment uses.</p> <p>In line with national planning policy, the Local Plan should go one step further to protect this business and add the specific builders’ merchant use to the list of protected employment generating <i>sui generis</i> uses within the glossary definition of Employment Land.</p>	<p>Context</p> <p>Travis Perkins (TP) own and operate builders’ merchants across London including a successful branch in Richmond at 8-10 Bardolph Road, TW9 2LH. This builders’ merchants provides an essential service to Richmond’s construction industry, supplying building materials to the trade and delivering direct to building sites, ultimately helping London build.</p> <p>TP builders’ merchants fall within the <i>sui generis</i> classification of the Use Class Order. Employment generating <i>sui generis</i> uses are often overlooked when setting out policies to protect employment uses within emerging development plans and when allocating sites for mixed-use redevelopment.</p> <p>The purpose of these representations is to highlight the important of and therefore the need to protect existing <i>sui generis</i> employment generating uses, specifically builders’ merchants, throughout London including in Richmond.</p> <p>Furthermore, we wish to demonstrate that builders’ merchants can function successfully alongside residential developments on mixed-use sites. Travis Perkins’ builders’ merchant branches have already been successfully incorporated into mixed-use schemes in London, including at Battersea Park Road in Wandsworth and St Pancras Way in Camden.</p> <p>At Battersea Park Road in Wandsworth, a ‘One Stop’ Travis Perkins builders’ merchant operates on the ground floor of a five storey building with flats above. This branch also provides an active frontage at street level providing the same function as a standard shopfront.</p> <p>The TP branch on St. Pancras Way is a fully operational TP builders’ merchant with an external yard area which successfully operates alongside (below) a 560 bed UNITE student accommodation development. Both of these sites demonstrate how an existing TP branch can form part of a residential-led redevelopment proposal.</p> <p>TP are currently considering similar developments on their existing sites across London and on other sites that they may seek to acquire in the future, including in Richmond upon Thames, however the existing builders’ merchants use <u>must be protected by policy and retained within any future</u></p>	<p>Comments noted. It is considered that the Council's evidence on protecting employment land is robust and that Policy LP 40 is sound.</p> <p>In addition, it should be noted that Greater London Authority has published in June 2017 two important studies and evidence base documents, which support the Council's policy approach:</p> <p>(1) London Office Policy Review 2017: this demonstrates a forecast demand for net additional office floorspace (based on office employment projections with allowance for vacancy) for the 2016-41 period of 166,160sqm, with a composite of trend-based and employment-based office floorspace projections of 78,100sqm.</p> <p>(2) London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +12ha (and a 1.8% ind. vacancy rate – where 8% is considered healthy).</p> <p>The above new studies, available at https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base, support the Council's approach to the protection of employment land, both in relation to land in office as well as in industrial uses.</p> <p>The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough. There is a presumption against the release of any employment land or stock in the borough to other uses. Therefore, Point 4 within the Policy is considered sound as the Council would not support the introduction of residential uses where these are incompatible with, or impact on, the continued operation of established employment uses.</p>

Furthermore, Policy LP 40 should encourage and promote mixed use employment / residential development with the more positive wording set out above.

development.

The draft employment policies in the Local Plan Review ensure that sui generis employment uses are protected, however they do not go far enough to specifically protect builders' merchants.

Policy LP40 - Employment and the Economy

Policy LP40 supports the protection of employment land with paragraph 10.1.1 of the supporting text confirming that this protection is also afforded to sui generis uses which have a significant employment generating floorspace. As set out above, the inclusion of builders' merchants in the glossary definition of employment uses will ensure that Policy LP40 affords protection to the existing business.

However, point 4 of Policy LP40 is not written positively, seeking to refuse mixed-use residential developments on industrial sites if they are not compatible with employment uses on the site or surrounding sites. In order for the policy to be written positively it should be re-worded to read:

"Mixed use development proposals should retain, and where possible enhance, the level of existing employment floorspace. The inclusion of residential use within mixed use schemes will not be considered appropriate where it would be compatible with, or impact on, the continued operation of other established employment uses within that site or on neighbouring sites"

Mixed-use development is promoted by the NPPF and there is no reason why employment uses cannot operate alongside residential uses, so long as suitable mitigation measures are put in place. This has been successfully demonstrated by Travis Perkins at a number of sites in London.

Travis Perkins are considering their options for modernisation and / or redevelopment of all of their sites throughout London. This may include redevelopment to provide a standalone builders' merchant or a mixed use development which retains the builders' merchant alongside residential. 8-10 Bardolph Road site could have the capacity to provide up to a maximum of 68 dwellings at a maximum density of approximately 260 units per hectare on this urban site, in line with the London Plan SRQ Density Matrix.

As has been demonstrated on other sites, not only by TP but by other industrial developers on sites throughout London, the builders' merchant use can continue to operate alongside a residential development, similar to the

is:

- Positively prepared – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

These representations demonstrate that the Council's approach to its housing target is unsound and that Policies LP36 and LP40 are unsound.

We note that the Publication Local Plan was adopted for development management purposes at a Cabinet Meeting of 13 December 2016.

Unsoundness of Policy LP40

Policy LP40 of the Publication Local Plan states that:

"Land in employment use should be retained in employment use for business, industrial or storage purposes."

The sub text of the policy further states that:

"there is a presumption against the release of any employment land or stock (office, industrial and storage floorspace) in the borough to other uses"

This policy is overly restrictive and does not provide any flexibility in changing the use of sites to alternative uses where there is a clear lack of demand for any type of employment use for the site.

Policy LP40 is therefore not in accordance with national policy. Paragraph 22 of the National Planning Policy Framework (NPPF), which states that:

"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."

protection of employment land, both in relation to land in office as well as in industrial uses.

225	49	Rob Shrimplin, Shrimplin Brown on behalf of CLS Holdings Plc	Policy LP 41 Offices Strategic Objectives, Meeting People's Needs, point 10; paragraph 3.1.33; paragraph 10.2.6; paragraph 10.2.8; paragraph 10.2.12.	No	Yes	Yes	Yes	Yes	<p>1. These representations to the London Borough of Richmond upon Thames Local Plan consultation are made on behalf of CLS Holdings Plc. CLS Holdings Plc recently acquired Harlequin House, 7 High Street, Teddington, TW11 8EE, a 6/7 storey office building. The building was constructed in the early 1980s and is now nearing the end of its life. It does not meet the requirements of modern business and its fabric and specification, in particular the location of the entrance and service cores, make it uneconomic to refurbish or adapt. It is of little architectural merit.</p> <p>2. The building falls within Teddington District Centre and the Teddington Conservation Area (Conservation Area 37). The building is covered by an Article 4 Direction removing Permitted Development Rights for Change of Use from offices to residential.</p> <p>3. Harlequin House is taller than buildings in the surrounding vicinity, although it is separated from its neighbours and set back from the main road behind a small green containing a number of mature trees that is designated as 'Other Open Land of landscape importance' (adopted Local Plan Policy DMOS3).</p> <p>4. The building is proposed to be allocated within the "Teddington and Waldegrave Road" Key Office Area under Policy LP41 Offices.</p> <p>5. An extract from the adopted Local Plan Proposals Map and photos of the existing building are provided at Appendix 1 to these representations. See Appendix (2) to this document for Appendix 1 plan and photos.</p> <p>6. This representation is to proposed Policy LP41 Offices and supporting text as well as to the Local Plan's Spatial Strategy. It draws out key themes from the NPPF, the Council's CL, the emerging Local Plan's evidence base and the Local Plan consultation itself with regards to offices and then tests proposed Policy LP41 against these, concluding that two changes are needed to make the proposed Policy Sound, namely: 1) Positively support intensification/redevelopment of existing office buildings/sites; and 2) Amend the requirement to provide "affordable office space" (criterion D5). NPPF (March 2012)</p> <p>7. The positive role the planning system is expected to play in delivering economic growth is witnessed by the fact that the first section of the NPPF is about "Building a strong, competitive economy". The opening paragraphs of this section make clear the positive role that the planning system is expected to play in delivering economic growth: "The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon</p>	<p>37. Based upon the above analysis, we consider that the emerging Local Plan is currently Unsound as it is not positively prepared; justified; effective nor consistent with national policy. We consider that two changes are required to Policy LP41 to make it Sound.</p> <p><u>1) Positively support intensification/redevelopment of existing office buildings/sites</u></p> <p>38. The above analysis makes clear that in order to ensure an adequate supply of office floorspace there is a need to not only protecting existing office floorspace but also positively support the intensification/redevelopment of existing office buildings/sites.</p> <p>39. This is consistent with the first section of the NPPF, "Building a strong, competitive economy", which sets out the positive role the planning system is expected to play in delivering economic growth. It is consistent with the following section of the NPPF, "Ensuring the vitality of town centres", which sets out a similarly positive role that the planning system is intended to play in supporting and growing town centres, which include office use.</p> <p>40. It is also consistent with the Local Plan evidence base. The 'Employment Land Study' by URS (June 2006), 'Employment Land Study' by URS (November 2009) and 'Local Economic Assessment' by Roger Tym and Partners (October 2010) all recognise the constraints on the supply of office floorspace in the Borough as a result of which new office floorspace is most likely to come about through intensification/redevelopment of existing buildings/sites. Consistent with this earlier work the Employment Sites & Premises Study 2016 Update' by Peter Brett Associates (December 2016) emphasises the need not just to "retain" but also to "encourage" new employment floorspace.</p> <p>41. The reliance on the need to intensify/redevelop existing sites is demonstrated by the fact that of the 28 allocated development sites identified in the Local Plan only 11 (39%) are proposed for employment use. All of the 11 are proposed to include a mix of uses, which will limit the amount of office floorspace that can be accommodated; a minority (5 of the 11) fall within a District of Town Centre, meaning that the majority of proposed allocations are in less sustainable locations; and the majority (8 of the 11) will only become available if the site is declared surplus to requirements, meaning that there is no guarantee that they will come forward.</p> <p>42. However, the London Office Policy Review by Roger Tym and Partners for the GLA (September 2012) and the 'Richmond Employment Land and Premises' by Peter Brett Associates (March 2013) both warn that office development in Outer London is only viable in Richmond Town Centre. This is also apparent from the 'Community Infrastructure Levy Viability Testing' (September 2013) which concluded</p>	<p>Comments noted. The Council considers that Policy LP41 (Offices) positively supports the intensification and redevelopment of existing office buildings and sites within the identified Key Office Areas, where development proposals for new employment or mixed use floorspace will be required to contribute to a <u>net increase</u> in office floorspace. This approach is supported by evidence contained in the LBRuT Employment Sites and Premises Study 2016 Update which states at paragraph 4.6: " <i>Office demand over the Plan Period is now double what it was in 2013. Since 2013 55,000 sq.m of office space has changed use through permitted development rights. Therefore, with demand growing and supply tightening, clearly the Council's policy approach of strong protection and encouragement of new office space is justified and indeed is an absolute requirement if the Borough is to continue to offer local employment to residents and opportunity to businesses.</i>" Furthermore, the May 2017 update to the study concluded at paragraph 2.123 that "the borough's employment base includes high rates of self employment and smaller businesses that require the kind of small to medium sized affordable office space that characterises the borough's Key Office Areas." The requirement for a quota of affordable office space for schemes exceeding 1,000 sqm within Policy LP41 is therefore based on robust and up to date evidence and considered to be fully justified. No changes required.</p> <p>Also note the Officer response under Comment ID 264 above in relation to the newly published GLA studies: (1) London Office Policy Review, June 2017 and (2) London Industrial Demand Study, June 2017.</p>
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future. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.” (paragraphs 18-20).

8. Hand in hand with the emphasis on the positive role that the planning system is expected to play is a specific warning that: “Investment in business should not be over-burdened by the combined requirements of planning policy expectations.” (paragraph 21).

9. In order to achieve these aims the NPPF explains that in drawing up Local Plans local planning authorities should do a number of things including setting out a clear strategy/vision, identify strategic sites, support existing/emerging sectors, support clusters, identify priority areas and facilitate flexible working.

10. The following section of the NPPF is concerned with “Ensuring the vitality of town centres” which includes office uses. It again makes clear the positive role that the planning system is intended to play in supporting and growing town centres, which include office use: “Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period.” (paragraph 23)

11. In order to achieve these aims the NPPF explains that in drawing up Local Plans local planning authorities should do a number of things. The tests for planning applications are limited to the sequential approach (paragraphs 24-25) and the impact test (paragraph 26).

CIL (July 2014)

12. The Council’s CIL Charging Schedule that was examined and approved in July 2014 was informed by ‘Community Infrastructure Levy Viability Testing’ (September 2013) by Peter Brett Associates. This Viability Testing demonstrates the lack of viability for office schemes.

13. In terms of the office sector, it explained that central London remained strong (paragraph 10.2) and Richmond remained strong compared to other non-central London locations (paragraph 10.3), but that office development by itself was not viable: “The evidence highlights that generally offices are currently only being delivered as part of mixed use schemes. Some agents commented that the office elements would not be delivered in isolation given the current economic climate and, in some areas of

that office development in the Borough was not viable enough to sustain imposition of a CIL Charge and that the only location that could was Richmond Town Centre which could only sustain a limited charge of £25/m². This concern over viability makes the need to positively support the intensification/redevelopment of existing office buildings/sites even more important.

43. Both the NPPF and the Local Plan evidence base therefore require the Local Plan to take a more positive approach towards positively supporting intensification/redevelopment of existing office buildings/sites.

2) Amend the requirement to provide “affordable office space” (criterion D5)

44. As well as the obvious financial burden of letting floorspace at 20% below market rents there is the added uncertainty/delay created by the fact that the rents would need to be agreed with the Council through the s106 obligation. There is also no advice in the Policy about how to agree a market rent with the Council.

45. The suggestion in the supporting text at paragraph 10.2.12 that the floorspace should be let to small and new businesses and not for profit organisations also adds potentially significant costs as a result of having to manage a large number of occupiers and the cost of having to find new tenants on a more regular basis as small/new businesses grow/contract. It also adds uncertainty because small/new/not for profit businesses cannot commit to pre-lets/long term leases (The ‘Local Economic Assessment’ by Roger Tym and Partners (October 2010) includes a specific warning about the strengths and weakness of smaller businesses). There is also no advice in the Policy about what constitutes a small/new business.

46. The fact that requirement to provide affordable office space has not been properly thought through is starkly demonstrated by the fact that it is suggested in the conclusions to the ‘Employment Sites & Premises Study 2016 Update’ (December 2016) as a “quota” without any analysis of its impact (paragraph 4.5) but then in the Local Plan becomes “at least 10% of the proposed office floorspace” which “must remain affordable for a minimum of 10 years”, again without basis on any analysis or evidence (paragraph 10.2.12).

47. The combined effect of the financial burden, the uncertainty and the lack of clarity in the Policy, as well as the fact that it is not based on any analysis/evidence, means it is likely to undermine the viability of office schemes.

48. This is a particular concern in light of the fact that, as explained above, the evidence base demonstrates that office development in Outer London, with the exception of Richmond Town Centre, is not viable.

Richmond upon Thames, the low rental levels achievable.” (paragraph 10.5) “Within Richmond town centre the prevailing tone of rent is between £323 per sqm to £377 per sqm. We would concur with the London Office Policy Review which stated that ‘only when rents are predicted to reach £323 sqm (£30 sqft) and with yields at 6.5%, does land have any substantial value. (Source: GLA (2009) London Office Policy Review (115)). This rental level is not achievable throughout most of Outer London”. (paragraph 10.6)

14. For this reason, and following consultation with agents (paragraphs 10.7-10.9) and their own viability analysis (paragraphs 10.10-10.12), they conclude that “new build ‘pure’ office development is viable in Richmond town centre”, albeit “In practice, in the current economic climate, office floorspace is unlikely to be delivered without a significant pre-let.” (Paragraph 10.13). Elsewhere “office development is unviable” and where it is coming forwards “offices are being delivered as part of mixed use developments which incorporates other higher value uses such as residential or retail” (paragraph 10.14).

15. As a result the consultants recommended, and the Council and Inspector agreed, that there should be a CIL charge for office developments within Richmond town centre (albeit at £25/m², significantly lower than the £150/m² charged for retail and the £190/£250/m² charged for residential) and no charge elsewhere.

Local Plan evidence base

16. The evidence base that informs the emerging Local Plan is substantial and stretches back over a long period of time. Whilst the different reports make a number of recommendations there is a consistent theme about the lack of viability for office schemes as well as the lack of development sites and the need to encourage the intensification/redevelopment of existing office sites. ‘Employment Land Study’ by URS (June 2006)

17. In its recommendations relating to offices the Study highlights that there is a lack of sites for office development and therefore that new floorspace will need to be accommodated on existing sites. It therefore recommends, firstly, protecting against the loss of office floorspace and, secondly, encouraging intensification and redevelopment of existing office floorspace: “Office Due to the limited availability of employment sites, the lack of any significant amount of vacant employment land or other land appropriate for new office development the additional demand for office space will have to be predominantly absorbed on existing employment sites. There is therefore a strong case for the LDF to facilitate improvement in the quality of the supply of office sites and premises. This can be achieved through a combination

49. The burden of providing affordable office floorspace is therefore likely to be counterproductive and in fact prevent office floorspace coming forwards.

50. It is also important to note that the emerging Local Plan does in fact offer significant encouragement to providing smaller/affordable units. There is a specific reference to this in the Local Plan’s “Strategic Vision” and in the “Strategic Objectives”. Proposed Policy LP41 ‘Employment and local economy’ includes specific support for “the provision of small units, affordable units and flexible workspace such as co-working space” at criterion 3. Proposed Policy LP41 already includes clear support for smaller businesses, including in its introduction and Criterion D2 and D3. A specific requirement for affordable office space is therefore not needed.

Change sought

51. Amend Policy LP41 and supporting text as follows (additions in bold, deletions struck through):

Offices

The Council will support a strong local economy and ensure there is a range of office premises within the borough, particularly for small and medium size business activities within the borough’s centres, to allow businesses to grow and thrive.

The Council will positively support intensification/redevelopment of existing office buildings/sites.

Retention of offices

No change

Key Office Areas

C. In the designated Key Office Areas, as shown on the Proposals Map, net loss of office floorspace will not be permitted. Any development proposals for new employment or mixed use floorspace will be required to contribute to a net increase in office floorspace. **The Council will positively encourage intensification/redevelopment of existing office buildings/sites within Key Office Areas.** Criteria 1 and 2 in A (above) do not apply to the Key Office Areas ~~areas~~.

New offices

D. The Council will support appropriate new office development **and the intensification/redevelopment of existing office buildings/sites** by the following means:

1. Major new office development should generally be within the five main borough centres.
2. Smaller scale office development will be encouraged in suitable locations, particularly within the designated Key Office Areas.
3. New office accommodation should be suitable to meet future needs, especially to provide for the requirements of local businesses and small firms.
4. Design of office floorspace for flexible occupation and

of measures such as:

- Robust LDF policy on protection of office premises. This will reduce hope values and increase the viability of refurbishing existing office premises.
- Intensifying the use of some existing employment locations.
- Redevelopment of some existing sites for continued employment use to meet more appropriately current demand (e.g. high quality office space).
- Redevelopment of some existing employment sites for employment-led mixed use development subject to providing at least the same amount of employment floorspace.” (Section 7.2.1).

18. The following section of the conclusions, “towards employment land policies” does suggest providing new premises for small firms, but only where appropriate. There is no further analysis of what this would involve or how it could be achieved: “Where appropriate the council should encourage new developments to provide premises suitable for small firms and start-up companies.” (Section 7.2.2, emphasis added).

‘Employment Land Study’ by URS (November 2009)

19. Consistent with the earlier 2006 Study, the 2009 Study again highlights that there is a lack of sites for office development and therefore that new floorspace will need to be accommodated on existing sites: “B1 land use recommendations ...there continues to be a strong case for the Council to facilitate improvements in the quality of the supply of office sites and premises in the Borough, particularly in the town centre areas of Richmond, Teddington and Twickenham” (Section 5.2)

20. It therefore makes three recommendations: to protect existing office floorspace, to permit redevelopment of B2 sites to B1 and to intensify existing employment sites. The justification for the third recommendation makes clear that as well as delivering an increase in floorspace this offers the opportunity to improve the quality of floorspace: “Our consultations with local property market agents concluded that there is currently a high proportion of average quality B1 premises in the Borough, particularly in the town centres of Teddington and Twickenham. Analysis of demand has shown that B1 occupiers generally require new/good quality premises, and as such there is currently a mismatch between supply and demand of office space in the Borough. As identified in the property market analysis, there is a lack of development sites capable of absorbing the forecast increase in demand for B1 uses to 2026. It would therefore appear sensible to allow existing office locations to be renovated and intensified to yield a greater amount of B1 floorspace within the same amount of employment land. Such

modern methods of working such as co-working space is encouraged.

5. The Council will **encourage** ~~require~~ the provision of affordable office space within all major developments with over 1,000sqm of office space; ~~this will be secured through Planning Obligations in line with the Planning Obligations SPD.~~

Delete paragraph 10.2.6 as it runs contrary to the evidence base which encourages intensification/redevelopment of existing office floorspace.

Amend paragraph 10.2.8 as follows: “In the Key Office Areas there is a presumption that the quantum of existing office floorspace will be retained or enhanced. The Council will not permit loss of office space in these areas and development of new office space and **intensification/redevelopment of existing office floorspace** is encouraged. Proposals for redevelopment of employment sites or mixed use schemes will be required to contribute to a net increase in office floorspace. Specific details would be discussed on a case by case basis.”

Delete paragraph 10.2.12 as it is no longer necessary.

52. Given the importance of these changes to the economic success of the Borough they should also be reflected in the Local Plan’s Spatial Strategy (additions in bold, deletions struck through):

Amend Strategic Objectives, Meeting People’s Needs, point 10 as follows: “Protect and encourage **the provision of** land for employment use **and intensification/redevelopment of existing office floorspace**, particularly for affordable small/medium spaces, start-up and incubator units and flexible employment space, in order to support the borough’s current and future economic and employment needs.”

Amend paragraph 3.1.33 as follows: “As a result of the Permitted Development Rights which allow the change of use of offices to residential, there has been a potential loss of approximately 80,000sqm of office floorspace (an estimated 26% of overall office floorspace in the borough and potential employment space for 6,400 people based on one person per 12sqm). As a consequence, the Council has already introduced two Article 4 Directions to prevent further changes of use from office to residential without the need for planning permission. In addition, this Local Plan introduces a new designation for ‘Key Office Areas’, in which a more stringent approach to the loss of offices will apply. The Council will encourage new inward investment and the creation of new offices, including **intensification/redevelopment of existing office floorspace and** refurbishment of older offices and flexible workspaces, particularly in the ‘Key Office Areas’. The increase in office floorspace in redevelopment schemes will be particularly

intensification could also result in the provision of new, better quality premises which meet the demands of Richmond upon Thames quality-sensitive occupiers.” (Section 5.2).

‘Local Economic Assessment’ by Roger Tym and Partners (October 2010)

21. Although the Assessment is produced by different consultants to the 2006 and 2009 ‘Employment Land Study’, it nevertheless again highlights that there is a lack of sites for office development and therefore that new floorspace will need to be accommodated on existing sites. This is explained in the first of the five “key issues” set out in the Assessment’s conclusions: “Quantity, quality and price of premises While Richmond borough’s economy is broadly successful and presents opportunities for growth, its capacity to accommodate more businesses and jobs is limited by the employment land and floorspace available. The local market needs to be able to provide high end quality offices for larger companies/inward investors but also flexible grow-on space for existing local businesses. In order to provide the renewal of premises necessary to remain competitive, it will need new floorspace. As mentioned earlier, it is likely to be the main constraint on future growth. With no new large sites currently being put forward for employment uses, there is little potential to expand floorspace provision in the borough significantly. Growth can be accommodated to some extent through refurbishment, use swaps, and intensification of use but it will not significantly alter the scale of the borough’s provision of employment floorspace. For these reasons, the Employment Land Review recommended that the existing office supply should be protected. The high house prices and high need for affordable housing mean that it is under constant pressure. It also recommended that the borough permits the redevelopment of existing industrial employment land for B1 use where appropriate; and intensify existing employment sites, where appropriate, to provide additional B1 floorspace.” (paragraphs 7.24-7.26).

22. It is also relevant to note the Assessment’s caution with regards to smaller businesses: “The high presence of micro-businesses and self-employment in the borough’s economy can be seen as a strength or as a weakness. It presents threats and opportunities. It is a strength as it shows the presence of an entrepreneurial, dynamic population and, in times of recession, is a source of alternative employment. It results in a diverse economy which does not rely on one major sector for employment and as such is likely to be more resilient to economic shocks. In addition, self-employment allows the borough to retain some of its highly skilled residents locally and supported.”

benefit from their knowledge and ideas. On the other hand, very small businesses are fragile: they tend to have a high failure rate. This can create instability in the economy. In addition, they do not have as much resources as larger companies to allocated to training or business development.” (paragraphs 7.31-7.33).

London Office Policy Review by Roger Tym and Partners for the GLA (September 2012)

23. This sets out the long term decline of office markets in Outer London (paragraph 4.1.6) whilst highlighting that Richmond has bucked this trend: “Perhaps unsurprisingly [on the basis that Richmond was the top scoring Outer London borough in terms of both businesses per 1,000 residents and UKCI (7 and 10 respectively in London and very high, 21 and 13, nationally)], as long ago as LOPR 04 Richmond was identified as one of the few Outer London areas where office development may be viable. LOPR 09 concluded “Our general view is that Richmond and Twickenham should continue to be monitored as potential office centres, although Richmond is by far the most promising”. This remains our view.” (paragraph 4.5.55).

24. However, even this positive conclusion strikes a note of caution saying that offices “may” be viable in Richmond. It also makes clear that Richmond and to a lesser extent Twickenham have potential, not the whole of the Borough.

‘Richmond Employment Land and Premises’ by Peter Brett Associates (March 2013)

25. This repeats the warning from the London Office Policy Review about the weaknesses in the Outer London office market and the relative strength of Richmond (Section 4) which, as explained above, serves to highlight the lack of viability for offices of other Outer London locations. The conclusion of the report warn about the poor quality of existing office floorspace: “Much of the vacant space is not fit for purpose for today’s business needs and comprises of secondary office stock which is at the very least due for refurbishment. However outside the key office centre of Richmond Town Centre, it is unlikely that sufficient rent or yield movement will occur to support this or any major redevelopment.” (paragraph 9.5)

26. As a result of this conclusion, rather than a blanket approach to retain all employment land they suggest an area based approach based on the fact that each of the local property markets is diverse.

‘Assessment of Office Stock in Richmond upon Thames’ by Peter Brett Associates (August 2015) informed by ‘Extending Article 4 Directions in the London Borough of Richmond upon Thames’ by Peter Brett Associates (February 2015)

27. Following the introduction of the change to Permitted

Development Rights in May 2013 to allow conversion of offices to residential the Council undertook monitoring and commissioned research to assess its impact. These reports are focused on protecting existing employment floorspace.

'Employment Sites & Premises Study 2016 Update' by Peter Brett Associates (December 2016)

28. Consistent with earlier work, the conclusion of the Study emphasise the need not just to “retain” but also to “encourage” new employment floorspace: “In response to heavy recent losses of both office and industrial space and land, and the need to support residents and the local economy through the availability of land and premises for employment uses, the Plan proposes to strengthen the overall approach towards retaining and encouraging new employment space/land...” (paragraph 4.2).

Redevelopment of office space in the Borough outside of the Key Office Areas (KOA) will only be permitted where a lack of demand is clearly demonstrated, and then alternative employment uses need to be contemplated before any non-employment use can be considered. The importance of low cost office space, often in town centres above shops is also identified for protection. The bar is set higher for redevelopment in the KOAs where proposals will need to include a net increase in office floorspace. New office space is encouraged particularly in the town centres, and the provision of new smaller scale to meet local business needs is encouraged particularly in the KOAs.” (paragraph 4.5)

29. The need for this balanced approach of not just protecting existing floorspace but also encouraging development of new floorspace has been exacerbated by the twin effects of reductions in supply and increases in demand: “[This update study] shows that demand for office floorspace has grown since the 2013 report, both in terms of the net demand as a result of the improved economic outlook, but also because of the effect of the PDR changes that have been far worse than could have been anticipated in 2013. Office demand over the Plan period is now double what it was in 2013 – 120,000 sq m, albeit the 2013 report looked to 2031 rather than 2033. Since 2013, 55,000 sq m of office space has changed use to non office uses, mostly residential through PDR. Therefore, with demand growing and supply tightening, clearly the Council’s policy approach of strong protection and encouragement of new office space is justified and indeed is an absolute requirement if the Borough is to continue to offer local employment to residents and opportunity to businesses” (paragraph 4.6).

30. With this in mind we are concerned that “the second phase” of the consultant’s commission to “review of the

fitness for purpose of the areas identified for designation as Key Office Areas” (paragraph 4.8) has not yet been undertaken. We reserve the right to add to these representations when this is published.

31. The conclusion states that “A quota of affordable office space is required for schemes exceeding 1,000sqm.” (paragraph 4.5). However, there is no analysis about whether this is deliverable, or the impact it might have on schemes. Nor is there any explanation of what is meant by “affordable”.

Local Plan consultation

32. The reliance on intensification/redevelopment of existing sites is demonstrated by the Site Allocations in Chapter 12 of the Local Plan. A summary table of the proposed employment Site Allocations is provided at Appendix 2 to these representations. ***See Appendix (X) to this document for Appendix 1 plan and photos.***

33. Of the 28 sites identified in the Local Plan as “key sites that are considered to assist with the delivery of the Spatial Strategy of this Plan”, only 11 (39%) are proposed for employment use.

34. All of the 11 are proposed to include a mix of uses, which will limit the amount of office floorspace that can be accommodated.

35. A minority (5 of the 11) fall within a District of Town Centre, meaning that the majority of proposed allocations are in less sustainable locations.

36. The majority (8 of the 11) will only become available if the site is declared surplus to requirements, meaning that there is no guarantee that they will come forward.

244	58	Matt Richards , Bidwells on behalf of Curzon St Ltd	Policy LP41 Offices	Yes	No	Yes			Yes	Yes	<p>We write on behalf of the owners of The Quadrant, Richmond to make representations in respect of the public consultation regarding the Richmond Local Plan Review, including proposed changes to the Proposals Map. The Quadrant office building, the NCP car park and the retail parade occupies an important location in Richmond Town Centre, adjacent to the railway station. The site forms part of a wider allocation at the Richmond Station that proposes a comprehensive redevelopment of the area to improve the transport interchange and increase retail and employment floorspace. This letter sets out our representations in relation to employment and town centre draft policies; parking draft policies; and the proposed allocation for the station site. We are of the view that some further consideration needs to be given to a selection of policies to positively plan for the site's future in a sustainable manner. See Appendix (3) to this document for site location plan, with client's site edged in red.</p>	<p>Policy LP41 'Part D'</p> <p>As currently drafted, Part D.5 of the policy requires affordable workspace from all major office developments. There will be situations, as is the case with The Quadrant, where it is appropriate and desirable to extend an existing building in size by more than 1000sqm. The current draft policy would place an onerous requirement that 10% of this be affordable workspace which will not be practical in respect of leases for the tenants.</p> <p>The National Planning Policy Framework (NPPF) states investment in business should not be over-burdened by the combined requirements of planning policy expectations (Paragraph 21). The Policy further confirms the planning policies should recognise and seek to address potential barriers to investment.</p> <p>It is therefore considered important that this part of the draft policy is amended so that the requirement of affordable floorspace is only applicable to a major redevelopment scheme is proposed. Otherwise it is likely to act as a deterrent to land owners and developers to deliver additional office floorspace in major centres through appropriate extensions to existing premises.</p> <p>The draft policy provisions to encourage economic development within Richmond town centre and this site are supported in principle, however some detailed changes are sought to enable the effective delivery of such development moving forward. These changes are considered necessary to make the Local Plan consistent with national policy and effective and thereby meet the tests of soundness set out in paragraph 182 of the NPPF.</p>	<p>Comments are noted. The Employment Sites and Premises Study (2017 Update) undertaken by Peter Brett Associates, concluded at paragraph 2.123 that <i>"the borough's employment base includes high rates of self employment and smaller businesses that require the kind of small to medium sized affordable office space that characterises the borough's Key Office Areas."</i> The requirement for a quota of affordable office space for schemes exceeding 1,000 sqm within Policy LP41 is therefore based on robust and up to date evidence and considered to be fully justified. No changes required.</p>
215	118	James Stevens, Home Builders Federation Ltd	Policy LP41: Offices		No				Yes		<p><u>The policy is unsound because it conflicts with national policy.</u></p> <p>The Council does not have a good justification to dis-apply the national policy extending permitted development rights for a change of use from offices to residential. It cannot dis-apply this in blanket way across the whole of the borough. It may define areas where it wishes to safeguard office accommodation, such as its Key Office Areas.</p> <p>The argument that London is confronted by unique set of circumstances whereby all its land supply is recycled does not hold. The challenges confronting Birmingham, Brighton & Hove, Bristol, Coventry, Ipswich, Crawley, Oxford, Leeds, Reading, Newcastle and many other towns and cities in England are as great but they have not sought to dis-apply the national policy.</p>		<p>Comments noted. It is considered that the Council's evidence on protecting employment land is robust and Policy LP41 is sound. Paragraph 4.6 of the LBRuT Employment Sites & Premises Study 2016 Update (Peter Brett Associates) clearly states: <i>"The policy change is evidenced by the impact of permitted development rights on offices in Richmond, and by the 2013 ES&P study that identified the need to increase office provision in the borough to meet a 62,000 sqm requirement. This update study substantially reinforces that view. It shows that demand for office floorspace has grown since the 2013 report, both in terms of net demand as a result of the improved economic outlook, but also because of the PDR changes that have been far worse than could have been anticipated in 2013."</i> No changes</p>

unwarranted and inconsistent with national planning guidance.

Assessment

The area in which the site is located is predominantly residential. The Barnes Village Supplementary Planning Document (December 2015) - which provides a detailed character assessment of the Castelnau Conservation Area (within which the site is located) - confirms this, and makes no reference to importance of office locations within the area. Section 2.3 of the SPD sets out the key planning policy aims for the area and again does not make any reference to the protection of employment premises in the area, which one would expect if the area was indeed suitable for allocation as a Key Employment Area in the emerging Local Plan.

In support of the proposed designation, the Council have published an updated Employment Sites and Premises Study (December 2016) which sets out the forecasted need for new office floorspace within the Borough up to 2033. This study finds that there is a significant increase in need for new office space, mostly due to the impacts of permitted development rights and an improved economic situation since the last assessment was undertaken in 2013.

We note that the study favours Experian's trend and sector analysis. The Experian forecasts tend to be most reliable at regional and national scales and consequently less so at the local economy level. Experian are macro-economic forecasts meaning that they provide a top down logic to forecasting based on nation or regional economic growth, which is apportioned at lower geographies. Typically these forecasts place less emphasis on local economic circumstances.

The robustness of the job projections are also questioned within other parts of the Council's evidence base. The Council's Strategic Housing Market Assessment (SHMA [December 2016]) states that "*Economic forecasts need to be treated with some degree of caution, they often show widely different outputs depending on the time of the forecast and the forecasting house*" (paragraph 6.8) and continues that "*overall, given the particular impact of a constrained land supply.....it seems reasonable to conclude (based on qualitative evidence) that the Experian forecasts are probably somewhat optimistic regarding future economic performance for use in the SHMA*" (paragraph 6.23).

proposed designation as a Key Office Area be removed. If it is considered that these allocations be continued, we would recommend that the flexibility provided by Paragraph 22 of the NPPF be built in to Policy LP 41 to allow the change of use of the site to other uses should it be demonstrated that is no future prospect of it being used for employment purposes.

Nevertheless, the SHMA models the level of housing need based on employment forecasts and concludes that if these are to be met then annual housing delivery would need to be 963 dwellings per annum, far higher than the proposed housing target of 315 dwellings per annum. On this basis, it is evident that the constrained housing supply brings into question, again, whether these employment projections are robust.

Over the years as the Council's development plan has evolved a number of employment land studies have been undertaken which over a relatively short period of time have identified differing levels of employment projections. Given that the Plan covers the period up to 2033 and the economic uncertainties that are likely to arise as a result of Brexit, coupled with changing working practices, means that it is far from certain that the current projections would not be subject to further change, especially over the medium to longer term. It is therefore considered prudent that sufficient flexibility is inbuilt to policies in order that they are able to respond to a change in circumstances without having to be subject of a separate review.

Irrespective of the robustness of the employment projections, what is not clear from the proposed employment projections and the update study is the qualitative demand for new office floorspace and to what degree site specific circumstances have been assessed. The emerging Plan confirms that the Key Office Area designations simply reflect the areas that we subject to the new Article 4 Directions that took effect on 1 October 2016. We do not consider this approach appropriate or robust and would expect that the decision to place such stringent restrictions on these sites to be based on robust site specific or area specific assessment. Indeed, the preceding 2013 Employment Sites and Premises Study does provide a more detailed assessment of individual areas and concludes – in respect to the Barnes area – that it mostly comprises high street and very marginal office accommodation. The 2013 study notes that (in relation to the Barnes area) 'in office terms most – although not all – office sites are more marginal and there are likely to be better options for making a stand than the properties in this area'. Neither the 2013 study nor the 2016 study identifies the site or wider area as "key" for the provision of office space, and neither recommends such a strict site specific restriction as that proposed. As such we do not consider that the proposed designation of the site as a Key Office Area is based on the necessary robust evidential basis.

In respect to the level of restrictions imposed by proposed Policy LP 41, the NPPF, at Paragraph 22, identifies a need for planning policies to be sufficiently flexible to allow for a change of use to alternative uses if there is no reasonable prospect of the site being used for that employment purpose. Policy LP 41 as currently worded, does not allow for any circumstances in which a change of use would be permitted for sites designated as Key Offices Areas. This approach is clearly contrary to the flexible approach advocated by the NPPF and as such we consider the Plan to be inconsistent with national planning policy.

The Council have historically had a restrictive loss of employment policy, however this has not been considered sufficient by the Council to retain the necessary employment floorspace to meet need. Whilst the release of employment land has been above the benchmark targets advocated by the GLA, having acted as planning consultants on a number of planning applications involving the loss of employment land (e.g. refs: 13/4019/FUL & 10/1447/FUL) we can testify that in each case detailed marketing information was provided (and accepted by the Council) that showed the subject properties simply did not meet the requirements of the market resulting in no demand for that property. It is acknowledged that planning permission for these schemes was granted prior to the publication of the latest employment land study, however employment land studies dating back to 2006 have identified a growing demand for office floorspace, at least, so these applications would have been assessed against the backdrop of an increasing need for office accommodation. In our view therefore, the site specific circumstances in terms of future demand; the quality of the site; and viability are important considerations that we consider has not been fully acknowledged by the Council's evidence base or emerging Policy as currently proposed.

The Policy as currently worded also does not provide scope for mixed use redevelopments which would result in some loss of employment floorspace. Whilst such schemes may result in the quantitative reduction, they are capable of delivering a number of other benefits including qualitative improvements in employment floorspace together with the delivery of important new housing for which there is a significant identified need (the latest SHMA identifies an identified annual need for 1,047 dwellings yet the proposed housing requirement is for only 315 dwellings per annum). The nature of many of the existing uses makes them entirely suitable to be incorporated into a mixed use redevelopment yet the

										restrictive nature of the policy does not permit such an outcome.		
										The draft Local Plan does not provide a detailed definition of a 'Key Office Area'; however for the reasons provided above we do not believe that the site can be considered suitable for such a designation.		
291	255	Tanja El Sanadid y, Indigo Planning Ltd on behalf of Shepherd Enterprises Ltd	Policy: LP 41 Offices See also: Proposals Map Changes Page: 12 Site name: High Street, Lower Teddington Road, Hampton Wick	No	No				Yes	<p>We are writing on behalf of our client, Shepherd Enterprises Limited, to make representation in respect of the Council's second consultation on the draft Local Plan (Publication). Shepherd Enterprises Limited is the owner of the land at 1D Becketts Place, Hampton Wick, KT1 4EW.</p> <p>We previously objected to the "consultation on scope of review of policies and draft site allocations" (letter dated 1 February 2016), and to the council's first consultation (letter dated 19 August 2017). We continue to express our objection to:</p> <ul style="list-style-type: none"> - Policy LP 36 (Affordable housing) and the requirement of a financial contribution on small sites; and - Site allocation policies LP 25 (Development Centres) and LP 41 (Offices). The consultation form is included with this letter. We have set out our justification below. <p>Policy LP 41 Offices</p> <p>Our client's site, 1D Becketts Place, Hampton Wick, KT1 4EW, benefits from prior approval (ref. 15/3256/GPD15) for the change of use from office (B1 use) to residential (C3), which was given on 22 September 2015. As such, the loss of office use and its redevelopment to residential use was permitted.</p> <p>Following the prior approval, a further planning application for the redevelopment of the site to provide eight residential units (16/2537/FUL) has been submitted to the council and is currently under consideration.</p> <p>The current Proposal Map Changes Local Plan document proposes the site to be part of a designated office area (Lower Teddington Road).</p> <p>Policy LP 41, para. 10.2.2, of the draft Local Plan states that the designation as a "Key office area" is applicable to sites subject to an Article 4 Direction. The Council gave notice on 4 September 2015 of an Article 4 Direction which took effect on 1 October 2016 for the removal of permitted development rights for the change of use from office use (Use Class B1a) to residential use (Use Class C3). We have objected to the Article 4 direction and the</p>	<p>Policies LP 25 and LP 41 do not recognise the predominately residential use within the Hampton Wick area, especially the riverside frontage south of Kingston Bridge. These policies seek to protect an area that has changed significantly as is no longer an area with office use character. Therefore, we consider Policy LP 25 [See Publication Local Objective ID 292] and LP 41 should reflect the existing character of the area, and remove the designation as "Key Office Area" including the Article 4 Direction.</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 second consultation on the draft Local Plan (Publication).</p> <p>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>	<p>Comments noted. It is considered that the Council's evidence on protecting employment land is robust and Policy LP41 is sound. Paragraph 4.6 of the LBRuT Employment Sites & Premises Study 2016 Update (Peter Brett Associates) clearly states: <i>"The policy change is evidenced by the impact of permitted development rights on offices in Richmond, and by the 2013 ES&P study that identified the need to increase office provision in the borough to meet a 62,000 sqm requirement. <u>This update study substantially reinforces that view.</u> It shows that demand for office floorspace has grown since the 2013 report, both in terms of net demand as a result of the improved economic outlook, but also because of the PDR changes that have been far worse than could have been anticipated in 2013."</i> No changes required.</p> <p>Also note the Officer response under Comment ID 264 above in relation to the newly published GLA studies: (1) London Office Policy Review, June 2017 and (2) London Industrial Demand Study, June 2017.</p>

										<p>designation as a “Key Office area”.</p> <p>We object to policy LP 41 and the designation of the riverside frontage as 'Key Office Area'. This stretch of riverside is entirely residential and shouldn't be designated as part of a 'Key Office Area'.</p> <p>As stated in our previous objection letter, dated 1 February 2016, we have undertaken our own desk-top review of uses along Lower Teddington Road using the Council’s planning records, Google Street View and Estates Gazettes search tool. This was supported by several site visits between September and December 2015. Our findings were set out in our previous objection letters, however, for clarity we have set out our findings again below:</p> <ul style="list-style-type: none"> - The riverside frontage is mainly residential, especially south of the railway line; - The area along the High Street is mixed use, accommodating residential, retail and some office uses; - The area south of Kingston Bridge leading towards Hampton Wick train station is mainly residential with A-class uses on ground floor levels. <p>These results clearly show that the riverside frontage south of Kingston Bridge is residential and not of mixed use. We therefore object to the designation as “Key office area” within the draft Local Plan and Proposals Map.</p>		
329	227	Jabed Rahman , Public Health, London Borough of Richmond	LP 41 Offices Section: New Offices (4) Page: 134	Yes	Yes	Yes				<p>See also Publication Local Plan Comment ID 322</p>	<p>Page 134, New Offices</p> <p>“4. Design of office floorspace for flexible occupation and modern methods of working such as co-working space <u>as well as consideration of health and wellbeing by incorporating active design</u> is encouraged.”</p>	<p>Comments noted. It is considered that Policy LP 30 and the proposed minor change with the addition of bullet point 7 (see Officer response to Comment ID 325 above) sufficiently covers the point raised by the respondent against LP 41. No changes required.</p>

337	295	Philip Allin, Boyer Planning Ltd on behalf of Twickenham Plating Ltd, Percy Chapman & Sons Ltd, Electroline Ltd	Policy: LP 41 Offices See also: Appendix 6 - Locally important industrial land and business parks Page: 226	Yes	No	Yes		Yes	Yes	<p>Electroline House & Surrounds, Twickenham – Representations to Local Plan</p> <p>I am writing on behalf of Twickenham Plating Ltd, Percy Chapman & Sons Ltd and Electroline Ltd, owners of Korus House, Electroline House, nos 2-4 Colne Road, nos 3-5, 4-6 & 7-9 Edwin Road, land r/o 19, 21 & 25 Lion Road, Twickenham, hereafter referred to as the site. We object to the proposed designation of these properties within a 'key office location' and a 'locally important industrial land and business park' as set out within the emerging Local Plan.</p> <p>Site Background</p> <p>The proposed designation of 'Electroline House and surrounds' as a locally important industrial land and business park and part of a key office location is a new designation being introduced through the current draft Local Plan. Previously, the area did not have any site specific designation with the proposals map of the adopted development plan simply identifying the site as being within the defined town centre of Twickenham. Separately the whole site is covered by an Article 4 Direction, removing permitted development rights allowing for a conversion from office to residential use, which came into force on 1 October 2016.</p> <p>The site comprises of a mixture of mostly poor quality buildings that have been developed gradually over time that provide a range of retail and commercial uses, mainly of a small scale. Access to the site is via a number of different points from Colne Road, Edwin Road and Lion Road. These multiple points of access are reflective of the piecemeal development of this area which is reiterated by the generally poor servicing arrangements to these properties (e.g. very limited on plot space for parking and manoeuvring of large vehicles). The Council's own assessment states that the site is "old fashioned in need of refurbishment" and are "scruffy, older premises offering cheaper light industrial, offices and storage and distribution" ('Assessment of Light Industrial and Storage Stock' [June 2016]). This contrasts with the purpose built Heathland Industrial Estate, on the opposite side of Heath Road from the site, which is all served via a single point of access with significant areas of parking and servicing.</p> <p>Given the generally poor quality of the existing buildings, the site's relative small size and close proximity to existing residential development means that it is considered that the Council's proposed designations (on top of the article</p>	<p>In light of our representations, we therefore consider that the site should not be designated as part of a 'key office location' or a 'locally important industrial land and business park'. If the Council does insist that these allocations be continued, we would recommend, as a minimum, that the following amendments be made to Policies LP41:</p> <p><i>LP41 Offices</i></p> <p><i>Key Office Areas</i></p> <p><i>In the designated Key Office Areas, as shown on the Proposals Map, loss of office floorspace will not be permitted unless re-provided as part of a mixed use scheme. Any development proposals for new employment or mixed use floorspace which result in a quantitative reduction in floorspace will need to be justified by complying with Criteria 1 and 2 (a and b). Criterion 2c does not apply to Key Office Areas.</i></p>	<p>Comments noted. It is considered that the Council's evidence on protecting employment land is robust and Policy LP41 is sound. Paragraph 4.6 of the LBRuT Employment Sites & Premises Study 2016 Update (Peter Brett Associates) clearly states: "The policy change is evidenced by the impact of permitted development rights on offices in Richmond, and by the 2013 ES&P study that identified the need to increase office provision in the borough to meet a 62,000 sqm requirement. <u>This update study substantially reinforces that view.</u> It shows that demand for office floorspace has grown since the 2013 report, both in terms of net demand as a result of the improved economic outlook, but also because of the PDR changes that have been far worse than could have been anticipated in 2013." No changes required.</p> <p>Also note the Officer response under Comment ID 264 above in relation to the newly published GLA studies: (1) London Office Policy Review, June 2017 and (2) London Industrial Demand Study, June 2017.</p>
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4 direction) represents an overly onerous level of policy protection that is unwarranted and inconsistent with national guidance.

Assessment

In support of the proposed designation, the Council have published an updated Employment Land Study (December 2016) which sets out the forecasted need for new office and industrial floorspace within the Borough up to 2033. This study finds that there is a significant increase in need for new office space, mostly due to the impacts of permitted development rights and an improved economic situation since the last assessment was undertaken in 2013. In respect to new industrial space, the increase in future need is far more modest and is mostly driven by construction sectors which outweigh reductions in other industrial sectors. We would note that the construction sector is generally considered to be more transient and so it is questionable to what extent this need translates into a floorspace requirement.

We note that the employment land study favours Experian's trend and sector analysis. The Experian forecasts tend to be most reliable at regional and national scales and consequently less so at the local economy level. Experian are macro-economic forecasts meaning that they provide a top down logic to forecasting based on nation or regional economic growth, which is apportioned at lower geographies. Typically these forecasts place less emphasis on local economic circumstances.

The robustness of the job projections are also questioned within other parts of the Council's evidence base. The Council's Strategic Housing Market Assessment (SHMA [December 2016]) states that *"Economic forecasts need to be treated with some degree of caution, they often show widely different outputs depending on the time of the forecast and the forecasting house"* (paragraph 6.8) and continues that *"overall, given the particular impact of a constrained land supply.....it seems reasonable to conclude (based on qualitative evidence) that the Experian forecasts are probably somewhat optimistic regarding future economic performance for use in the SHMA"* (paragraph 6.23). Nevertheless, the SHMA models the level of housing need based on employment forecasts and concludes that if these are to be met then annual housing delivery would need to be 963 dwellings per annum, far higher than the proposed housing target of 315 dwellings per annum. On this basis, it is evident that the constrained housing supply brings into question, again, whether these employment

projections are robust.

Over the years as the Council's development plan has evolved a number of employment land studies have been undertaken which over a relatively short period of time have identified differing levels of employment projections. Given that the Plan covers the period up to 2033 and the economic uncertainties that are likely to arise as a result of Brexit, coupled with changing working practices, means that it is far from certain that the current projections would not be subject to further change, especially over the medium to longer term. It is therefore considered prudent that sufficient flexibility is inbuilt to policies in order that they are able to respond to a change in circumstances without having to be subject of a separate review.

Irrespective of the robustness of the employment projections, what is not clear from the proposed employment projections is the qualitative demand for new industrial and office floorspace. In the case of industrial floorspace, given that demand is driven by construction related activities (e.g. plumbers' merchants, timber yards, car showrooms) it is reasonable to assume that they are driven by certain operational requirements (e.g. easy access and sufficient space for larger vehicles, adequate storage space, on-plot parking, good 'kerb' appeal). In reality, it is likely that the industrial premises would need to be a sufficiently high quality, both in terms of the building and their location, in order to meet these requirements. On this basis, it would be wrong to assume that just because an existing property is currently in some form of industrial (or office) use it does not mean that it will continue to be commercially attractive in the future should the current occupiers vacate the property.

It is for this reason that the NPPF, at paragraph 22, identifies a need for planning policies to be sufficiently flexible to allow for a change of use to alternative uses if there is no reasonable prospect of the site being used for that employment purpose. The Council's proposed policies (LP41 & 42), as currently worded, does not allow for any circumstances in which a change of use would be permitted. This approach is clearly contrary to the flexible approach advocated by the NPPF and in our view the qualitative shortcomings of the existing buildings are likely to limit their attractiveness to any potential industrial or office user.

The Council have historically had a restrictive loss of employment policy, however this has not been considered

sufficient by the Council to retain the necessary employment floorspace to meet need. Whilst the release of employment land has been above the benchmark targets advocated by the GLA, having acted as planning consultants on a number of planning applications involving the loss of employment land (e.g. refs: 13/4019/FUL & 10/1447/FUL) we can testify that in each case detailed marketing information was provided (and accepted by the Council) that showed the subject properties simply did not meet the requirements of the market resulting in no demand for that property. It is acknowledged that planning permission for these schemes was granted prior to the publication of the latest employment land study, however employment land studies dating back to 2006 have identified a growing demand for office floorspace, at least, so these applications would have been assessed against the backdrop of an increasing need for office accommodation. In our view therefore the quality of the site and premises themselves is an important consideration that we consider has not been fully acknowledged by the Council's evidence base or emerging Policy.

The policy as currently worded also does not provide scope for mixed use redevelopments which would result in some loss of employment floorspace. Whilst such schemes may result in the quantitative reduction, they are capable of delivering a number of other benefits including qualitative improvements in employment floorspace together with the delivery of important new housing for which there is a significant identified need (the latest SHMA identifies an identified annual need for 1,047 dwellings yet the proposed housing requirement is for only 315 dwellings per annum). The nature of many of the existing uses makes them entirely suitable to be incorporated into a mixed use redevelopment yet the restrictive nature of the policy does not permit such an outcome.

The draft Local Plan does not provide a detailed definition of a 'key office location' or a 'locally important industrial and business park', however for the reasons provided above we do not believe that the site can be considered suitable for either designation.

Summary and recommendation

In summary:

- The site has developed in a piecemeal fashion over a long period of time and therefore comprise of a mixture of generally lower quality buildings;

											<ul style="list-style-type: none"> • The existing uses that take place at the site are varied (comprising of both A and B classes), are relatively small scale in nature and to date have not been subject of a specific employment designation within the adopted Local Plan; • The robustness of the employment projections within the latest employment land study are questionable, as highlighted within other parts of the Council's evidence base, thereby limiting the weight that should be attached to them; • There has been no detailed qualitative assessment undertaken to inform what type of industrial and office floorspace is required to meet future need; • Contrary to national planning guidance, the Council's proposed planning policies (LP41 and 42) do not provide any circumstances in which a loss of employment floorspace would be acceptable and therefore the policies are not considered to be sufficiently flexible. • In light of this lack of flexibility, there is no scope to provide a mixed use scheme which could result in a quantitative reduction in floorspace, however at the same time it could result in a number of other benefits which in our view outweigh any harm (e.g. qualitative improvements, delivery of important new housing). 	
339	241	Sadie Wykeham, Roberts & Wykeham Films Ltd	Policy: LP 41 Site Allocation: 42-46 Glenthams Road See also: Publication Local Plan - Proposals Map Changes Site: 42-46 Glenthams Road, Barnes Paragraph: 2.5 Key Office Areas Page: 28	No	No		Yes	Yes	Yes	Yes	Please see Publication Local Plan Comment ID 288	<p>Comments noted. It is considered that the Council's evidence on protecting employment land is robust and Policy LP41 is sound. Paragraph 4.6 of the LBRuT Employment Sites & Premises Study 2016 Update (Peter Brett Associates) clearly states: <i>"The policy change is evidenced by the impact of permitted development rights on offices in Richmond, and by the 2013 ES&P study that identified the need to increase office provision in the borough to meet a 62,000 sqm requirement. <u>This update study substantially reinforces that view.</u> It shows that demand for office floorspace has grown since the 2013 report, both in terms of net demand as a result of the improved economic outlook, but also because of the PDR changes that have been far worse than could have been anticipated in 2013."</i> No changes required.</p> <p>Also note the Officer response under Comment ID 264 above in relation to the newly published GLA studies: (1) London Office Policy Review, June 2017 and (2)</p>

												London Industrial Demand Study, June 2017.
319	157	Jonathan Stoddart, CBRE on behalf of LGC Ltd	Policy: LP 41 Office Paragraph: 10.2.9 Page: 135 Policy: LP 42 Industrial Land and Business Parks Paragraph: 10.3.6 Page: 139 Appendix 6 National Physical Laboratory and LGC Ltd, Hampton Road, Teddington Page: 225 OTHER: Proposals Map Change Changes Local Plan Paragraph 2.5.1 Page 9 Maps of Key Office Areas Page: 14 Map of Key Office Area - National Physical Laboratory, Teddington OTHER: All paragraphs and policies that relate to the proposed employment allocation of the LGC Limited site.	No		Yes	Yes	Yes	Yes	<p>See Appendix (10) to this document for site plan and earlier representations. We write on behalf of our client LGC Ltd. This response to consultation on the Publication Version of the Local Plan follows representations submitted on behalf of LGC Ltd, in respect of previous iterations of the Local Plan, dated 28th January 2016 and 18th August 2016. In addition, on 28th June 2016, the site was submitted to the GLA London SHLAA for consideration.</p> <p>It should be noted that, as identified within previous representations, LGC Ltd site is incorrectly identified within the publication draft plan, under the demise of 'National Physical Laboratory' under 10.2.9 on p135. These representations do not seek to repeat comments made previously, notwithstanding the three sets of representations should be read together (see Appendix 2). These representations seek to further make the case for a mixed-use allocation at the site, allowing for enabling development to support the LGC Ltd business. We note that the publication version of the Local Plan seeks to protect this site as a 'key office area' and 'locally important industrial land and business park', thereby preventing any net loss of office floorspace. We strongly advocate the release of the site from this protective employment allocation, given that a mixed-use allocation would allow for the retention of a nationally significant employer in Richmond, whilst actively contributing to the housing land supply of the borough.</p> <p>Ultimately, LGC Ltd can only continue to operate from within London Borough Richmond upon Thames (LBRuT) if enabling residential development can be progressed on part of the site to cross-subsidise the development of a new fit-for-purpose facility.</p> <p>Previous representations make the case for mixed-use development on the LGC Ltd site, allowing for the development of a new, fit-for-purpose building that meets the current needs of this modern, high-technology, knowledge-based employer.</p> <p>The importance of retaining LGC Ltd within the borough has been highlighted within the publication version of the Local Plan. Paragraph 10.1.4 states "the borough is home to nationally important scientific institutions such as the head office of the Laboratory of the Government Chemist (LGC)". This paragraph goes on to state that "Scientific, innovation and research, provision of incubator units and laboratories will be supported", (emphasis by CBRE).</p> <p>Given the above draft policy wording, LGC Ltd would welcome the support of the Council to enable the continued operation and retention of LGC in the borough.</p>	In light of the above, it is therefore proposed that a mixed-use residential/employment allocation would be both suitable and appropriate enabling development, allowing LGC Ltd to have a continuing presence in LB Richmond for the foreseeable future.	<p>Comments noted. It is considered that the Council's evidence on protecting employment land is robust and Policy LP41 is sound. Paragraph 4.6 of the LBRuT Employment Sites & Premises Study 2016 Update (Peter Brett Associates) clearly states: "<i>The policy change is evidenced by the impact of permitted development rights on offices in Richmond, and by the 2013 ES&P study that identified the need to increase office provision in the borough to meet a 62,000 sqm requirement. <u>This update study substantially reinforces that view.</u> It shows that demand for office floorspace has grown since the 2013 report, both in terms of net demand as a result of the improved economic outlook, but also because of the PDR changes that have been far worse than could have been anticipated in 2013.</i>" No changes required.</p> <p>Also note the Officer response under Comment ID 264 above in relation to the newly published GLA studies: (1) London Office Policy Review, June 2017 and (2) London Industrial Demand Study, June 2017.</p>

Clearly, this must facilitate, whenever reasonably required, the modernisation of such business' facilities in order to successfully sustain critically important employers such as LGC Ltd.

There are important benefits for supporting the retention of LGC Ltd including its longstanding ability to attract and retain highly skilled employees specialising in the life sciences market. Indeed, a considerable proportion of employees based at LGC Ltd headquarters in Teddington are highly-skilled.

It is broadly accepted that a borough's 'stock' of high skilled workers is one of the key determinants of its economic performance. Thriving local economies require a local workforce with high levels of employability. It should be that employment and skills are drivers of local economic growth. A motivated, flexible, and skilled workforce attracts employers and boosts productivity.

Aside from the demonstrable economic benefits there are also a broad number of social and demographic benefits. Indeed, without opportunities for skilled work, the local authority will risk an ageing workforce as young people will ultimately relocate from such an area in search of higher skilled work, training and other benefits elsewhere. It is clear that LGC Ltd contribute economically to LBRuT, however, it is not solely the economic value that is important, but also the global reputation of scientific excellence that it provides within the life sciences sector, which is associated of course with LBRuT.

There is a compelling case for enabling development in this instance, whereby LGC Ltd can continue to reside and operate its headquarters from the Borough in the years to come, retaining highly skilled employees within a renowned and growing business of both national and global significance.

In summary, a proportion of the site is no longer required by LGC, whilst the facility requires substantial modernisation and structural change.

We trust that the above comments are helpful and can be taken into full account during the publication stage of the emerging Local Plan. Given the information and justification presented through the submission of representations (dated 28th January 2016, 18th August 2016 and 15th February 2017) to the Council, we strongly consider that the publication version of the Local Plan in its current form is **unsound**.

7	198	Anthony Oakley	LP42 and Appendix 6 - Locally important industrial land and business parks - St Clare Business Park	Yes	No							The proposed business park is now used by 'heavy' industrial vehicles that can hardly enter and exit using the current access gates. Safety posts outside are constantly knocked down. Since its construction Holly Road has become much more congested with parked cars and it is already difficult to navigate with a car let alone lorries. The bridge over the railway line into School Road is very narrow and lorries have previously caused damage to fencing and signage.	Access to industrial estate to be located in Windmill road as per the recent housing application which was made. If the Holly Road entrance is continued to be used then consideration made to making Holly Road one way from the said entrance to the bridge in an on-coming direction i.e. Holly Road is only fully navigable in one direction from the railway bridge to the High Street. Vehicles need to be restricted in size that can be allowed access to the site. Currently scaffolding lorries that have limited turning capabilities and large drainage lorries currently use the site.	Comments noted. No changes required. This is a matter for consideration through the development management process.
6	119	Linda Hooper	LP42 and Appendix 6 - Locally important industrial land and business parks - St Clare Business Park	Yes	No							Whilst I support the business park for small scale industrial use, the size and amount of vehicles entering the park causes real problems on Holly Road and the bridge over the railway line. The business park is in the middle of a very residential area. Lorries often cannot turn into the park because of parked vehicles causing massive congestion and hold ups. One van sat blaring his horn because he could not turn in.	1: The park needs to be for small commercial/industrial use only. 2: The size of vehicles allowed onto Holly Road needs to be limited 3: If the above are not possible then Holly Road needs to be 2-way up to the entrance to the business park and no entry beyond. This would ease the traffic over the bridge which would be one way. This would also ease the congestion caused by the car business behind 43 Holly Road.	Comments noted. No changes required. This is a matter for consideration through the development management process.
194	289	Tim Rainbird , Quod on behalf of Travis Perkins Plc	Policy LP 42 Industrial land and Business parks		No							<p><u>The London Plan FALP (2015)</u></p> <p>The London Plan FALP (March 2015) seeks to protect London's industrial land, but also allows for the release of sites if it will contribute to wider local planning objectives. Policy 4.4 places emphasis on the need to manage the release of industrial land stating:</p> <p>"The Mayor will work with boroughs and other partners to:</p> <p>a) adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London, including for good quality and affordable space</p> <p>b) plan, monitor and manage release of surplus industrial land where this is compatible with a) above, so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal" (our emphasis)</p> <p>The London Plan discusses the need for industrial sites to remain in London in order to provide necessary services to local businesses with an evidence based approach promoted to reconcile demand and supply of industrial land and related uses. It is significant that the Mayor's Land for Industry and Transport SPG (September 2012) further emphasises the need to protect existing industrial sites but promotes a mixed-use approach to redevelopment with the use of careful siting, design and access arrangements to prevent any conflict of future</p>	<p><u>Employment Land- Glossary Definition</u></p> <p>The glossary of the Local Plan sets out that Employment Land (Industrial Land and Business Parks) is identified as <i>'the B Classes and sui generis uses such as vehicle repair garages, scrap yards, petrol filling stations'</i>.</p> <p>In order to ensure that the specific builders' merchant use is protected, TP requests that the glossary is updated to include builders' merchants to ensure that this use receives specific policy protection.</p> <p>The Glossary should read:</p> <p>Industrial land and business parks are identified in this Plan (see Policy LP 42) and refer to land used for general industry, light industry, warehouses, open storage, self storage, distribution and logistics and other similar types of employment, as well as any other uses which fall within the B1(c), B2, B8 Use Classes or are Sui Generis (such as vehicle repair garages, scrap yards, petrol filling stations, builders' merchants).</p> <p>By including reference specifically to builders' merchants, our client will have certainty that this important local service is protected going forward and that Travis Perkins' can continue to provide an essential service to the local trade for the lifetime of the Plan.</p> <p>Furthermore, if the builders' merchant use specifically referred to in the glossary, it will also give the Council certainty that the existing use is protected and will be retained and continue to operate if the Site is redeveloped</p>	Comments noted. It is agreed that builders' merchants could be added to the list of Sui Generis uses classed as Employment Land within the Glossary to ensure that they are afforded protection. Therefore, a minor change is proposed to Page 233 of the Glossary - Industrial Land and Business Parks - the final part to read as follows: <i>"...as well as any other uses which fall within the B1 (c), B2, B8 Use Classes or are Sui Generis (such as vehicle repair garages, scrap yards, petrol filling stations, builders' merchants)."</i>

occupiers.

It is with this in mind that TP is seeking to ensure that their business interests are protected whilst providing much needed land for housing in London. TP has already demonstrated on a site in the heart of Camden that this type of mixed-use redevelopment is feasible, with a builders' merchant and residential units successfully functioning on the same site.

Travis Perkins Bardolph Road

Travis Perkins is the freehold owner of the TP builders' merchant branch at 8-10 Bardolph Road, Richmond, TW9 2LH. A Site Location Plan is provided at **Document 1**.

TP are seeking to ensure that this successful business and important service provider is protected for builders' merchant use within the final version of the Local Plan.

Emerging Employment Policies

The Local Plan Review will update LB Richmond's Development Plan, replacing the policies set out in the existing Core Strategy and Development Management Plan. The two employment policies which have been introduced that are relevant to TP are Policy LP40 (Employment and the Economy) and Policy LP42 (Industrial Land and Business Parks).

These policies go some way to ensuring that sui generis employment uses are protected, however the key to ensuring that these policies protect the specific builders' merchant use is to include this use within the glossary definition of employment land.

Policy LP42 – Industrial Land and Business Parks

Policy LP 42 provides protection for existing employment and industrial sites. The policy specifically states that the Borough has a very limited supply of industrial land and that demand for this space is high.

In planning terms industrial land is considered to be land within Class B1 and Class B2 of the Use Class Order. Although the policy seeks to protect industrial sites, the omission of sui generis builders' merchant's uses from the glossary definition of industrial land provides limited protection for this specific use.

The suggested wording of the Glossary definition of

by another party.

Conclusion

Builders' merchants provide an essential service which support London's ability to build much needed homes. Residential uses can successfully operate alongside employment uses (B Class) and also sui generis employment generating uses such as builders' merchants. This has been demonstrated on a number of TP sites in London, with great success.

This should be acknowledged within the employment policies in the final version of the Local Plan by including builders' merchants as a specific protected use within the glossary definition of Employment Land.

Furthermore, policy LP 40 should promote and encourage solutions to redevelopment of employment land for mixed use development so long as the existing uses is retained and necessary mitigation measures are put in place.

This is in line with the NPPF which promotes mixed use developments and the policies within the London Plan (2015) which seeks to protect employment uses throughout London.

										Employment Uses (Industrial Land and Business Parks) as set out above would add certainty to TP that their specific builders' merchant use is protected.		
277	93	Kevin Goodwin, RPS CgMs on behalf of Mr Leek, Goldcrest Land	Policy: LP 42 Industrial Land and Business Parks Paragraph: 10.3.6 Page: 136 Sandycombe Centre, Sandycombe Road, Kew	No	No	No	Yes	Yes		<p>The Councils proposed policy reads:</p> <p>New Policy LP 42</p> <p>Industrial Land and Business Parks The borough has a very limited supply of industrial floorspace and demand for this type of land is high. Therefore the Council will protect, and where possible enhance, the existing stock of industrial premises to meet local needs.</p> <p>Retention of industrial space A. There is a presumption against loss of industrial land in all parts of the borough. Loss of industrial space (outside of the locally important industrial land and business parks) will only be permitted where:</p> <ol style="list-style-type: none"> 1. Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an industrial based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing use or an alternative industrial use completed over a minimum period of two continuous years in accordance with the approach set out in Appendix 5; and then 2. A sequential approach to redevelopment or change of use is applied as follows: <ol style="list-style-type: none"> a. Redevelopment for office or alternative employment uses. b. Mixed use including other employment generating or community uses. <p>Locally important industrial land and business parks B. The Council has identified locally important industrial land and business parks (as set out in the supporting text and Appendix 6). In these areas:</p> <ol style="list-style-type: none"> a. loss of industrial floorspace will be resisted unless full, on-site replacement floorspace is provided; b. development of new industrial floorspace and improvement and expansion of existing premises is encouraged; and c. proposals for non-industrial uses will be resisted where the introduction of such uses would have an adverse impact on the continued operation of the existing services. 	<p>Comments noted. It is considered that the Council's evidence on protecting employment land is both robust and up to date. Therefore the Policy approach set out in LP42 is sound. Paragraph 4.12 of the LBRuT Employment Sites and Premises Study 2016 Update (Peter Brett Associates) states: "<i>The update study has shown that a sector analysis using forecast employment data supports the view that release is no longer the appropriate policy response, and what industrial land is left in Richmond needs to be retained and new land identified to provide premises for the modest growth in employment floorspace identified in the forecasts.</i>"</p> <p>Also note the Officer response under Comment ID 264 above in relation to the newly published GLA studies: (1) London Office Policy Review, June 2017 and (2) London Industrial Demand Study, June 2017.</p>	

New industrial space

C. Development of appropriate scale industrial uses, and improvement and expansion of such premises, is encouraged. New industrial space should be flexible and adaptable for different types of uses and suitable to meet future needs, especially to provide for the requirements of local businesses.

Our recommended changes in respect of Locally important land are:

- a. loss of industrial floorspace will be resisted unless similar levels of potential jobs are re-provided;
- d. proposals for mixed use development including other employment generating uses will be considered.

Paragraph 10.3.6 contains list of proposed Locally important industrial land and business parks. It states:

- Kempton Gate Business Park, Oldfield Road, Hampton
- Kingsway Business Park, Oldfield Road, Hampton
- St Clare Business Park, Holly Road, Hampton
- 74 Oldfield Road, Hampton
- 50-56 Waldegrave Road, Teddington
- National Physical Laboratory and Laboratory of the Government Chemist, Hampton Road, Teddington
- Teddington Business Park, Station Road, Teddington
- West Twickenham cluster (including Gregg's Bakery and surroundings), Twickenham
- Heathland Industrial Estate, Twickenham
- St George's Industrial Estate, The Green, Twickenham
- Mereway Road Industrial Estate, Twickenham
- Swan Island Industrial Estate, Strawberry Vale, Twickenham
- Electroline House and surrounds, Twickenham
- St Margarets Business Centre, Winchester Road, St Margarets
- Twickenham Film Studios and Arlington Works, St Margarets
- Market Road, Richmond
- Sandycombe Centre, Sandycombe Road, Kew
- Marlborough Trading Estate, Mortlake Road, Kew
- Mill Farm Business Park, Whitton
- Big Yellow Self Storage, Lower Mortlake Road, Richmond
- Big Yellow Self Storage, Lower Richmond Road, Richmond
- Currie Easy Self Storage, Market Road, Richmond

Our recommended change is the deletion of the Sandycombe Centre from this list:

~~Sandycombe Centre, Sandycombe Road, Kew~~

An application for the development of this site for a mixed use development was recently considered by the Council and is now at appeal. Whilst the application was refused permission this was not on land use grounds and the principle of mixed use redevelopment has been accepted by the council officers and members. Revised proposals have been submitted and are currently with the Council for consideration. Therefore unless the land use policy approach towards the site is changed as we have suggested the site should be deleted from the list of sites to be designated as LIL.

It is considered that in any respect the site should also be deleted as it is no longer a suitable future employment site. It has been marketed with no interest for two years and so should now be considered suitable for a wholly residential development. Such an approach was supported by the Kew Society and others.

[RELATED TO AND CONDITIONAL UPON THESE PROPOSED CHANGES]

Appendix 6 - Locally important industrial land and business parks

As noted above the Council have included the Sandycombe Centre, Sandycombe Road, Kew within the proposed LIL designation. Our recommended change is the deletion of the Sandycombe Centre from this list.

See Appendix 29 of this document for the proposed deletion of an image from Appendix 6 of the Publication Local Plan, as noted above.

314	189	Shaun Lamplough, Mortlake with East Sheen Society	Employment and Local Economy New Policy LP42: Industrial Land and Business Parks Page 139, para 10.3.6							<p>MESS comments on Pre-Publication Local Plan, August 2016 - Note that no Industrial Land and Business Parks have been designated in Mortlake / East Sheen. Rents are very high in this area and there is concern about the absence of service industry here.</p> <p>Council's response to MESS comments, January 2017 - The Council has carefully identified existing industrial land and business parks, based on thorough evidence and research, as set out within the Council's borough-wide Assessment of Light Industrial and Storage Stock and Appendices. Mortlake and East Sheen do not contain industrial areas of a sufficient size to allow the Council to identify 'locally important industrial land and business parks' in this area.</p> <p>MESS comments on Publication Local Plan, February 2017 - Noted.</p> <p>Council's response to MESS comments, January 2017 - The redevelopment of the Stag Brewery in Mortlake (site allocation SA23) will contain employment uses which the Council envisages to support local service industries.</p> <p>MESS comments on Publication Local Plan, February 2017 - Pleased to note that the Stag Brewery redevelopment will include such employment opportunities.</p>	Comments noted. No changes required.
336	95	Jonathan Manns, Colliers International on behalf of Greggs PLC	LP 42 Industrial Land and Business Parks	No	Yes	Yes	Yes	Yes	<p><i>(See Appendix (7) to this document for the full response including all Appendices)</i></p> <p>1. Introduction And Background</p> <p>Colliers International is instructed by Greggs PLC (hereafter "Greggs") to make representations on their behalf in respect of the Publication Local Plan consultation document. This work has been supported by Landmark Chambers.</p> <p>These representations are therefore intended to summarise Greggs current position, but also to signpost issues of particular concern which Colliers International and Landmark Chambers wish to explore in greater detail at the Examination in Public.</p> <p>The representations comment specifically on issues of legal and procedural compliance, primarily the "soundness" of the Plan and the "Duty to Co-operate". They should be read in conjunction with responses made by Greggs to previous draft development plan consultations, which are summarised in the table below.</p> <p>Consultation Document - Date Call for Sites -January 2013 Site Allocations Plan DPD - November 2013 Scoping Consultation - April 2016 Pre-Publication Local Plan -August 2016</p> <p>Copies of each consultation response are appended to these representations for reference purposes. Specific reference is made to each in the context of the Plan's soundness at the appropriate point.</p>	<p>Comments noted. It is considered that the Council's evidence on protecting employment land is both robust and up to date. Therefore the Policy approach set out in LP42 is sound. Paragraph 4.12 of the LBRuT Employment Sites and Premises Study 2016 Update (Peter Brett Associates) states: "<u>The update study has shown that a sector analysis using forecast employment data supports the view that release is no longer the appropriate policy response, and what industrial land is left in Richmond needs to be retained and new land identified to provide premises for the modest growth in employment floorspace identified in the forecasts.</u>"</p> <p>Also note the Officer response under Comment ID 264 above in relation to the newly published GLA studies: (1) London Office Policy Review, June 2017 and (2) London Industrial Demand Study, June 2017.</p>	

Greggs have an interest in the Plan as the freehold owner of land at Gould Road, Twickenham. The property does not possess the requisite fitness for purpose and this could not be resolved through an application to redevelop the site in accordance with policy. The adopted and emerging policies are self-contradictory to the extent that Greggs have shown a redevelopment would result in a loss of floorspace in order to address highways and amenity issues.

These representations relate specifically to the land in question at Gould Road. They have regard to both the proposed allocation of this for employment purposes within the 'West Twickenham cluster (including Greggs Bakery and surroundings), Twickenham' and the extent to which the text of draft Policy LP42 would apply in consideration of its future.

For the avoidance of doubt, Greggs strongly objects to the Borough's proposal to allocate their site as 'Locally Important Industrial Land'. Greggs also object to the proposed wording of draft Policy LP42.

Greggs consider that the draft plan has not been positively prepared and is unsound. It lacks soundness because it is not justified, effective or consistent with national policy. Greggs also consider that the draft plan is inconsistent with the London Plan.

2 Soundness

The NPPF sets out at paragraph 182 that Local Plans will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. The Examination in Public is the next step in this instance. Greggs are mindful that a local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:

- **Positively Prepared:** The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified:** The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective:** The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities, and;
- **Consistent with national policy:** The plan should enable the delivery of sustainable development in accordance with the policies of the framework.

Which of the soundness criteria does the Local Plan fail to

meet?

Greggs consider that, a result of the approach set out at Policy LP42 “Industrial Land and Business Parks”, the Publication Local Plan does not meet any of the four soundness criteria set out by the NPPF.

We do not consider that the Publication Local Plan has been *positively prepared* as the thrust of the strategic vision and objectives has not been reflected by Policy LP42 “Industrial Land and Business Parks”, which sets out an overly restrictive and inflexible approach.

The approach to industrial land in the borough is not *justified* as it does not represent the most appropriate strategy for delivering new jobs in the borough and is not based on proportionate evidence.

It has also been demonstrated in previous representations that the allocation of the site for industrial use is unlikely to be *effective*, as the site is significantly constrained, with limited prospects of any new purpose built accommodation being delivered.

We also consider that, as currently drafted, the proposed Policy LP42 results in the Publication Local Plan being unsound as it is in conflict with paragraphs 22 and 161 of the National Planning Policy Framework (NPPF). In this respect, the Publication Local Plan is not *consistent with national policy*.

Further detail demonstrating that the Publication Local Plan does not meet the tests of soundness outlined in the NPPF is set out in Section 3. Greggs also consider that the approach set out by Policy LP42 is inconsistent with the London Plan. Further justification in this respect is set out at Section 4.

Why does it fail?

The allocation of the Greggs site for industrial use and the restrictive nature of Policy LP42 does not provide the flexibility or positive approach to plan-making that is required by the NPPF and London Plan.

Greggs have previously submitted evidence which demonstrates that the site is no longer appropriate for industrial uses. A site plan showing a policy-compliant industrial redevelopment is included at Appendix 1. This accommodates all vehicles on site, as would be required by the emerging Controlled Parking Zone. It shows that less floorspace and fewer jobs would be achievable. To this extent it is clear that draft Policy LP42 could not be successfully applied as currently proposed in terms of either its text or the proposed allocation.

The unrestricted industrial use of the site is incompatible with the surrounding area and it is unlikely that a developer could viably re-provide improved accommodation in the context of those policies set out within the adopted and emerging plan. Evidence relating

to the viability of industrial redevelopment is included at Appendix 2.

This is not to suggest that some employment uses could not be accommodated, but that alternative employment uses would be more appropriate and could better contribute to the Borough's needs.

In this respect the allocation of the site for a mixed-use residential-led development, in-line with the draft policy set out in earlier drafts of the Site Allocations Plan (2013) is considered a more appropriate use of the site.

How can the Plan be made sound?

The following could be undertaken:

1. Reallocate the Greggs site for a residential-led mixed use scheme; if, without prejudice, this is not achieved, then we would suggest the following:
2. Remove the "West Twickenham Cluster" from the list of areas identified as "locally important industrial land and business parks"

Separately, amendments should be made to Policy LP42.

These include the following:

- The requirement for two years of marketing evidence to be provided in order to justify the loss of industrial land should be amended to one year. The requirement for marketing evidence should be removed entirely where it can be demonstrated that the site cannot viably be bought forward for the identified use.
- The quality and fitness for purpose of sites and accessibility to the strategic road network should be included as criteria to be taken into account when assessing if sites are suitable for continued industrial use. This is in keeping with the criteria set out in the London Plan.
- The restrictive approach to the loss of industrial floorspace should be revised to include consideration of employment capacity. Wording should be amended to resist either floorspace or jobs. This approach should also be followed at Policy LP40.

Full justification for the proposed amendments is set out in the following sections.

3 NPPF Tests

3.1 Positively Prepared

The NPPF requires Local Plans to be positively prepared. The draft plan, however, contains an obvious disconnect between the strategic priorities and the detailed policies set out in the Publication Local Plan.

The Publication Local Plan outlines the key issues facing the borough and sets out the strategic vision and objectives for the plan period. These are wide ranging and include a number that are relevant to the Greggs site.

It is particularly notable that the strategic vision of the Local Plan seeks to safeguard the residential quality of life

and confirms that the amenity of residents and local neighbourhoods will be protected and action taken on environmental issues and pollution. At present, however, the industrial use of the Greggs site has a significant adverse effect on the amenity of local residents, which is likely to continue if the allocation of the site for industrial use is taken forward. The existing units benefit from an unrestricted permission which enables 24 hour working, with associated servicing. Amenity is impacted by noise, smells and traffic. Further detail regarding this has been set out in representations submitted to previous consultation exercises. See particularly appendices 3, 4 and 5.

The Publication Local Plan also sets out strategic objectives, which cover a number of issues, including employment. In particular, the Council seek to protect and encourage land for employment use, "*particularly small and medium-sized enterprises and creative industries to grow the employment base of the borough*" (page 17). The borough previously identified in the Site Allocations Plan DPD that the site was suitable for start-up and small scale business uses. This approach therefore sought to promote the strategic objectives for the borough through the proposed allocation. However, Policy LP42 designates the Greggs site as "locally important industrial land" and seeks to resist the loss of industrial floorspace unless full, on-site replacement floorspace is provided.

The general protection of the site for industrial use does nothing to encourage SMEs or start-up businesses and does not therefore support the borough's current or future employment needs. Nor is the same amount of floorspace achievable under current policy through a new application. This was made clear previously in Greggs representations to the Pre-Publication Local Plan consultation.

Specialist advice provided by Steve Mitchell (Director, Colliers Industrial and Logistics Agency) was submitted to the Pre-Publication Local Plan consultation and this is included at Appendix 2. This confirms that, due to a number of site-specific constraints the site would be unattractive to the vast majority of industrial investors. This view has been informed by feasibility work undertaken in conjunction with ACG architects, which explored industrial redevelopment options for the site. This exercise demonstrated that, due to the site's constraints, an industrial redevelopment scheme would provide less floorspace and would be likely to result in a reduction in the number of jobs.

Greggs have also made available an indicative scheme for the residential-led redevelopment of the site. This is included at Appendix 6. It shows, conversely, that a

residential-led redevelopment scheme incorporating B1 uses would enable a similar number of jobs to be maintained on the site to those which are associated with the existing bakery by increasing the employment density of the space provided.

It is not clear to Colliers International or Landmark Chambers that this information has been considered by the Council in drafting the Publication Local Plan. There is a lack of transparency in this regard.

Greggs is of the opinion that it is evident the protection of the site for industrial use is inconsistent with the thrust of the overall vision and objectives of the Publication Local Plan, both in terms of the adverse impact on residential amenity and the missed opportunity to provide a location for small/medium businesses and start-ups.

Greggs is of the opinion that, in order to ensure the plan is positively prepared, it is necessary for Policy LP42 to reflect the criteria set out at London Plan Policy 4.4. This is discussed further at section four. However, in summary, the quality and fitness for purpose of sites should also be used as criteria against which proposals for the redevelopment of industrial sites is assessed.

We are also of the opinion that the requirement for sites to be marketed for two years in order for industrial space to be released for other uses is too prescriptive and unjustifiable. This approach will hold up the release of appropriate sites. It does not therefore accord with paragraph 22 of the NPPF which seeks to avoid the long-term protection of industrial sites where there is no reasonable prospect of the site being used for this purpose. We therefore consider that Policy LP42 and the associated Appendix 5 are amended to require sites to be marketed for a period of one year.

3.2 Justified

In order to be justified, the NPPF requires Local Plans to set out the most appropriate strategy when considered against the reasonable alternatives. The London Plan states at Policy 4.4 that where appropriate due to the environmental and transport restrictions of a site, existing industrial sites should be released and new industrial allocations should be located in areas that do not have sensitive neighbours (such as residential uses) and are close to a main road.

Addressing employment needs requires a spatial and Borough-wide approach rather than reactive safeguarding of existing stock. There are other sites within the Borough which would be better suited to allocation for industrial uses than the property at Gould Road. Other large sites currently proposed as redevelopment allocations in the Publication Local Plan include those such as SA21 Sainsbury's, Lower Richmond Road, Richmond and SA28

Barnes Hospital, East Sheen. These better meet the objectives of the London Plan. They should also be considered for industrial uses and allocated accordingly instead of Greggs' property.

The Employment Land Review (ELR) undertaken by Peter Brett Associates in December 2016 and the "Assessment of Light Industrial and Storage Stock in Richmond upon Thames 2016", produced by the Council, form the evidence base for the employment policies set out in the Publication Local Plan. The Council's Assessment appraises specific clusters and sites, and includes a review of the West Twickenham Cluster, which includes the Greggs site. This identifies a number of issues which demonstrate the site is unsuitable for continued industrial use.

The ELR assessment of the site confirms that access is *"poor for Bakery lorries as they are in conflict with other road users until they access the main road"*. In assessing the quality of environment, the ELR notes that the *"site is enclosed by residential streets with no room for expansion. The roads are too narrow once cars are parked on both sides for lorries to turn in one go"*. The Assessment also notes that the entrance to the bakery is unsuitable. The ELR also notes the condition of the building as being *"fair"*.

This implies that they are not worthy of protection *"generally, those properties defined as "good" or "high" quality were considered as worthy of protection as were modern buildings and good quality period properties."*

Despite identifying a number of problems with the site, the ELR concludes that the site should be protected for industrial use as it is a long standing employment area. This is a fundamental flaw in the approach to allocating land for development. To protect all existing industrial locations in this way is simplistic. It does not reflect an informed approach to plan-making and is inherently unsustainable.

An additional concern in this respect is the clear lack of consistency in the approach to site allocation undertaken by the Council. There are, for example, sites which have very similar topographical characteristics to those at Gould Road but which are proposed for release.

This is particularly evident when a comparison is made between the Greggs site and "SA27 Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen". In very simple terms, Site SA27 also includes existing employment uses and is surrounded by terraced housing to the east and west. These sites are shown on the Publication Local Plan extracts below and overleaf. SA 27 Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen

(See Appendix (7) to this document for extracts)

Despite the clear comparison which can be made between

the two sites, the draft SA27 allocation allows for a much greater level of flexibility in terms of its future uses. It indicates that a mixed use scheme with housing could be considered. No evidence is provided by the Council to demonstrate why the Telephone Exchange site has been approached in an inconsistent manner to that at Gould Road. There is therefore a lack of transparency and inconsistency of approach. This is not justified.

Greggs is of the view that the rationale used by the Council to protect the Greggs site for industrial use (it is a "long standing employment area") could equally be applied to the Telephone Exchange site, or vice versa. The Publication Local Plan also identifies a number of other commercial sites that have been declared surplus to operational requirements and are being proposed for mixed use allocation to incorporate an element of residential use. These sites include a number of other telephone exchanges and Royal Mail delivery offices in Hampton, Teddington and Whitton (Site Allocation references SA4, SA5, SA6 and SA13). All of these sites are located in heavily residential areas surrounded by high density terraced housing. They would appear to suffer from similar access and amenity constraints as the Greggs site. Yet here again the Council is taking a different approach, further demonstrating a lack of consistency in terms of plan-making.

Greggs are eager to stress that this is despite these issues being identified in the NLP Employment Land Assessment provided previously in the representations (at Appendix 3) which were submitted to the Pre-Publication Local Plan consultation.

On the basis of the information set out above, we consider that the approach to site allocation employed by the Council is inconsistent and unclear. The Council has failed to provide a robust evidence base and transparent rationale for allocating sites in the Publication Local Plan and we do not consider that all reasonable alternatives have been reviewed. The plan does not therefore provide an appropriate strategy and should therefore be considered unsound.

3.3 Effective

In order to ensure that the strategic objectives are delivered in the plan period, there is a need for the development management and site allocation policies to take a pragmatic approach to the redevelopment of existing sites. If this is not done, then the prospects of development coming forward on allocated sites are greatly reduced, resulting in the plan being ineffective.

The proposed safeguarding of existing industrial and office accommodation solely for employment uses, and the viability issues associated with this approach, means that

it is unlikely that any new purpose built accommodation will come forward on the Greggs site over the plan period. It is therefore unlikely that the Publication Local Plan strategic objectives will be realised.

In the event that the Greggs site were allocated for a mixed-use development, the introduction of residential use on the site would allow for cross-subsidised affordable workspace for start-up and local businesses which would be unviable to bring forward on their own. This approach could enable a similar level of employment to that which an industrial unit could accommodate, in a manner more in keeping with the surrounding area and better suited to meeting local needs. It would therefore be a better reflection of the strategic vision and objectives of the Publication Local Plan and be more likely to deliver the type of employment uses that the Council identify as required to meet people's needs.

3.4 Consistent With National Policy

In order to be considered sound, the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. We do not consider that the Publication Local Plan is in accordance with the policies set out at paragraphs 22, 158 and 161 of the NPPF. Further detail in this respect is provided below and overleaf.

NPPF – Paragraph 22

The NPPF makes clear that “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 this purpose” (paragraph 22). As set out in the previous sections and representations to earlier Local Plan consultation exercises, it has been demonstrated that the site is unsuitable for continued industrial use. In particular, and as set out previously, specialist advice was provided by Steve Mitchell (Director, Colliers Industrial and Logistics Agency) at Appendix 6 of the submission to the Pre-Publication Local Plan consultation. This is re-provided at Appendix 2 of these representations. This confirmed that, due to a number of site-specific constraints, the site would be unattractive to industrial occupiers. It is evident that, in allocating the Greggs site for industrial use, the Council have not taken this evidence, or paragraph 22 of the NPPF, into account. Issues which relate to highways and noise have also been made clear, with evidence of this at in the Pre-Publication representations at Appendix 3.

The Council has itself confirmed through the Publication Local Plan strategic vision and objectives, that the priority for employment in the borough is the provision of small / medium sized units, start-up and incubator units and flexible employment floorspace. The long-term protection of the Greggs site for industrial use would not achieve

these objectives despite evidence provided by Greggs making clear that this would in fact be the most appropriate form of employment use to accommodate on the site in the future.

NPPF – Paragraph 47

The NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. The housing land supply for the Borough is dependent on a small number of large key sites being developed. This introduces a significant amount of risk to the validity of the Borough's five year housing land supply.

Greggs is of the opinion that the delivery of housing should be monitored closely to ensure an adequate supply is maintained. If it is not, an appeal could be made at sites with the capacity to provide housing within the Borough under Paragraph 14 of the NPPF. This would threaten the ability of the emerging plan to be successfully applied.

NPPF – Paragraph 158

Paragraph 158 of the NPPF requires each local planning authority to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

We consider that the "Assessment of Light Industrial and Storage Stock in Richmond upon Thames 2016" and Employment Land Study (2016), which forms part of the Publication Local Plan evidence base, is inadequate as it does not take into account the evidence provided by Greggs through previous representations. Greggs is of the opinion that doing this would have allowed the Council to undertake a more holistic assessment of the site, and would have reinforced that the site is unsuitable for continued industrial use.

NPPF – Paragraph 161

Publication Local Plan Policy LP42 also fails to meet paragraph 161 of the NPPF which requires local planning authorities to use an evidence base to assess the existing and future supply of land available for economic development and its sufficiency and suitability to meet identified needs.

The "Assessment of Light Industrial and Storage Stock in Richmond upon Thames 2016", does not consider the site suitable for continued industrial use when assessed against a number of criteria. However, the Council has resolved to allocate the site on the basis that it is a "long-standing employment area". It appears that this recommendation has been reached not through an assessment of suitability, but through a desire to

introduce the long-term protection of the site for industrial use which paragraph 22 of the NPPF seeks to avoid.

4 Consistency With The London Plan

In addition to the four tests of soundness set out in the NPPF and considered in previous sections, it is also necessary for the London boroughs to ensure that Local Plans are in accordance with the London Plan. Indeed, for many London Plan policies, clear guidance is provided on the issues that local authorities should take into account when preparing Local Plans.

As set out previously, the Publication Local Plan strategy seeks to protect and maintain its employment base, and enhance it through new provision to accommodate the expected job growth. The spatial strategy prescribes that the London Plan requires a 'restrictive' approach towards the transfer of industrial land to other uses and this should be adopted in the Borough. It outlines that this means that a cautious approach should be taken to releasing industrial land for other uses.

Greggs is of the opinion that the Borough has fundamentally misunderstood the requirements of the London Plan in this regard. The London Plan requirement is for locally significant industrial sites to be designated on the basis of robust evidence demonstrating their particular importance for local industrial type functions to justify strategic recognition and protection, which is clearly not the case in this instance.

The London Plan, at Policy 4.4 "Managing Industrial Land and Premises", sets out a variety of criteria to be taken account of when preparing Local Plans. In particular, the policy requires local planning authorities to take account of a range of factors when demonstrating how the stock of industrial sites in the borough will be planned and managed. This includes elements such as the quality and fitness for purpose of sites (criteria e) and accessibility to the strategic road network (criteria f). This has not been reflected in the draft policy.

Moreover, there is a lack of transparency in terms of how these criteria have been applied to the proposed site allocations. As set out in section three, the Publication Local Plan identifies a number of other commercial sites that have been declared surplus to operational requirements and are being proposed for mixed use allocations to incorporate an element of residential use. However, they would appear to suffer from similar access and amenity constraints as the Greggs site. The Transport Assessment and Noise Assessment submitted to the Pre-Publication Local Plan consultation provide detailed analyses of these amenity constraints, but have not been considered by the Council. This information is contained at

Appendix 3.

Further to this, the supporting text of London Plan Policy 4.4 provides guidance on the designation of industrial sites. In particular, boroughs are required to make explicit in DPDs the types of uses considered appropriate in locally significant industrial sites and distinguish these from more local industrial areas (para 4.10). The Publication Local Plan does not designate any strategic industrial sites or locally significant industrial sites, so it is assumed that the "locally important industrial land" identified by the Council is protected to a lesser degree. The correct approach should be adopted and this matter clarified.

5 Conclusion

Greggs is of the view that the Publication Local Plan does not meet the soundness criteria set out by the NPPF. In this respect, the Publication Local Plan is not positively prepared, justified, effective or consistent with national policy. It should not therefore be adopted without amendments to address this.

Greggs has previously made clear that the site at Gould Road is no longer appropriate for industrial uses. They have also demonstrated that an industrial redevelopment which accorded with policy is not deliverable. Conversely, Greggs have provided evidence which makes clear that the same number of jobs as currently exist could be achieved in a form of employment provision which better meets the Borough's vision and needs as part of a residential-led mixed-use scheme.

The allocation of the Greggs site for industrial use is in complete contradiction to the evidence which has been provided. The wording of draft Policy LP42 is also inconsistent with the London Plan and does not provide the flexibility or positive approach required by the NPPF. The draft should not therefore be adopted without amendments to address this.

For the avoidance of doubt, Greggs strongly objects to the current policy approach and proposed allocation.

338	295	Philip Allin, Boyer Planning Ltd on behalf of Twickenham Plating Ltd, Percy Chapman & Sons Ltd, Electroline Ltd	Policy: LP42 Industrial Land and Business Parks See also: Appendix 6 - Locally important industrial land and business parks Page: 226	Yes	No	Yes		Yes		Yes	See comment Objective ID 337.	In light of our representations, we therefore consider that the site should not be designated as part of a 'key office location' or a 'locally important industrial land and business park'. If the Council does insist that these allocations be continued, we would recommend, as a minimum, that the following amendments be made to Policies LP42: <i>LP42 Industrial Land and Business Parks</i> <i>Locally important industrial land and business parks</i> <i>a. loss of industrial floorspace will be resisted unless full, on-site replacement floorspace is provided. The only exception being if such re-provision is demonstrated to be unviable;</i> <i>b. development of new industrial floorspace and improvement and expansion of existing premises is encouraged; and</i> <i>c. proposals for non-industrial uses will generally be resisted unless it can be demonstrated that the current premises do not meet any identified need, as evidenced through complying with criteria A1 and A2.</i>	Comments noted. It is considered that the Council's evidence on protecting employment land is both robust and up to date. Therefore the Policy approach set out in LP42 is sound. Paragraph 4.12 of the LBRuT Employment Sites and Premises Study 2016 Update (Peter Brett Associates) states: " <u>The update study has shown that a sector analysis using forecast employment data supports the view that release is no longer the appropriate policy response, and what industrial land is left in Richmond needs to be retained and new land identified to provide premises for the modest growth in employment floorspace identified in the forecasts.</u> " Also note the Officer response under Comment ID 264 above in relation to the newly published GLA studies: (1) London Office Policy Review, June 2017 and (2) London Industrial Demand Study, June 2017.
335	95	Jonathan Manns, Colliers International on behalf of Greggs PLC	Policy: LP 42 Industrial Land and Business Parks Paragraph: 10.3.6 (Locally important industrial land and business parks)		No		Yes	Yes	Yes	Yes	See Publication Local Plan Comment ID 336 remove the "West Twickenham cluster" from the list of areas identified as "locally important industrial land and business parks".	Comments noted. It is considered that the Council's evidence on protecting employment land is both robust and up to date. Therefore the Policy approach set out in LP42 is sound. Paragraph 4.12 of the LBRuT Employment Sites and Premises Study 2016 Update (Peter Brett Associates) states: " <u>The update study has shown that a sector analysis using forecast employment data supports the view that release is no longer the appropriate policy response, and what industrial land is left in Richmond needs to be retained and new land identified to provide premises for the modest growth in employment floorspace identified in the forecasts.</u> " Also note the Officer response under Comment ID 264 above in relation to the newly published GLA studies: (1) London Office Policy Review, June 2017 and (2) London Industrial Demand Study, June 2017.	

242	112	Janice Burgess, Highways England Company Ltd	Policy LP 44 Sustainable Travel Choices																																							Support welcomed. No changes required.
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185	288	Sarah Hoad, Transport for London	Policy LP 44 - Sustainable Travel Choices Pages: 143-146							<p>This letter follows receipt of the notification that the London Borough of Richmond has undertaken consultation on the publication version of the proposed Local Plan. The following provides relevant updates and commentary on the proposed wording where appropriate, which follows previous consultation in January 2016 and July 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</i></p> <p>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. The GLA letter makes reference to the need to have regard to TfL's specific comments in respect of transport and infrastructure.</p> <p>The following provides commentary on the proposed transport policies as included in draft Policy LP44. The Infrastructure Delivery Plan (IDP) and Infrastructure Delivery Schedule (IDS) were prepared in 2012 and 2013 respectively. It is recommended that with respect to the Local Plan, the emerging London Plan and Mayor's Transport Strategy and TfL's Business Plan that these documents are reviewed and updated. TfL will engage with the Council with regards to specific projects and schemes.</p>	<p><i>LP44B - Walking and cycling'</i> seeks to protect and enhance key routes within the Borough which is encouraged in accordance with London Plan policy 6.9 and 6.10. The Local Plan makes reference to the three strategic walking routes, as identified in the London Plan - the Thames Path, the Capital Ring and the London Loop. Opportunities to protect and enhance these routes, including the provision of appropriate wayfinding are supported by TfL and contributions to support this should be secured via planning obligations, where appropriate. Again this should reflect the Mayors aspirations for Healthy Streets in his 'A City for All Londoners' document.</p> <p><i>'LP44C - Public transport'</i> is supportive of improvements to the public transport network which is welcomed with respect to London Plan policy 6.2. TfL is committed to improving the reliability, efficiency and accessibility of the bus network and will continue to work with the Council to this effect.</p> <p><i>'LP44G - Taxis and private hire vehicles'</i>. Following previous comments, TfL welcomes consideration towards the provision for taxis and private hire vehicles within the Borough. With respect to paragraph 11.1.16 it is noted that <i>'taxi ranks should be conveniently located close to the venue they serve and accessible for all with adequate space for customers to queue'</i>. Reference should be made within Policy LP44G to TfL's Ranks Action Plan (2015).</p>	<p>Comments and support are noted. Paragraph 11.1.16 of the reasoned justification to Policy LP 44 (Sustainable Travel Choices) refers to the Transport for London's Ranks Action Plan (2015) and this is considered to be sufficient without a further reference within part G of the policy.</p> <p>The minor proposed change with respect to paragraph 11.1.16 could be accommodated as follows: "Taxi ranks should be conveniently located <u>close to the venue they serve</u> and accessible for all with adequate space for customers to queue."</p>
256	69	Samantha Powell, Education Funding Agency	Access / Transport Issues							<p>In identifying sites and developing policies for new schools, consideration should be given at an early stage in the site appraisal process as to how the use of public transport, cycling and walking can be encouraged to help reduce the number of car journeys to and from new schools. The inclusion of a well-developed green travel plan can help to ensure that new schools are better integrated with existing communities. The EFA therefore supports text at 5.G (Sustainable Travel), existing policy DM TP3 (Enhancing Transport Links) and new policy LP 44 (Sustainable Travel Choices) which reflect these principles.</p>		<p>Support welcomed. No changes required.</p>

198	223	Helena Payne, Port of London Authority	Paragraph 11.1.12 Policies: LP18 & LP19, LP44 Pages: 64-68 & 143-148 Paragraphs: 5.7 to 5.8.2 & 11.1.12	Yes	No	Yes		Yes	Yes	The Council's approach to riverside use is welcomed, it is however considered that the policy should set out its support for riverside development to seek to utilise the river for the transportation of construction waste and materials wherever possible.	Consideration of the PLAs comments/concerns and request for further information should be given before appropriate and sound consideration can be given.	Noted. Policy LP 44 (Sustainable Travel Choices) specifically refers to the encouragement of the use of the River Thames for freight transport. In addition, policy LP 24 on waste management requires development proposals, where appropriate, to make use of the rail and the waterway network for the transportation of construction, demolition and other waste. No changes required.
184	288	Sarah Hoad, Transport for London	Policy LP 45 Pages: 146-148 Appendix 3 Pages: 210-211							<p>This letter follows receipt of the notification that the London Borough of Richmond has undertaken consultation on the publication version of the proposed Local Plan. The following provides relevant updates and commentary on the proposed wording where appropriate, which follows previous consultation in January 2016 and July 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.</i></p> <p>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. The GLA letter makes reference to the need to have regard to TfL's specific comments in respect of transport and infrastructure.</p> <p>The Local Plan as it stands does not fully comply with current London Plan policy with regard to parking provision. TfL/GLA has suggested measures which would ensure compliance. Further discussions are sought with the council in respect of these comments.</p>	<p>Parking</p> <p>TfL/ GLA currently object to the proposed parking policy which is contrary to the London Plan parking policy 6.13 and Addendum table 6.2 car parking standards, which clearly applies maximum parking standards. The Local Plan policy LP45 and parking standards in Appendix 3 uses Public Transport Accessibility Level's (PTAL's) to set parking levels. In particular parking standards set out for new residential development within PTAL 0-3 are not compliant with the London Plan and the following suggestions are made to rectify this:</p> <ul style="list-style-type: none"> • The London Plan policy does not support a requirement for car parking provision in new development and as such sets maximum criteria. To comply with the London Plan it must be clearly stated that the standards proposed are a maximum. • In outer London a more flexible approach to parking standards may also be acceptable in some limited locations within PTAL 0-1. The parking standards shown for PTAL 0-3 should be amended to reflect the levels set out in the London Plan. <p>TfL welcomes further discussion with the Council with regard to the details of the proposed parking standards. A flexible approach to parking provision in PTAL 3 is not acceptable in line with the London Plan policy 6.13, and a limited flexibility in PTAL 2 would only be accepted under very specific circumstances which would need to be justified and agreed with TfL. TfL will provide further comments with respect to this in due course.</p> <p>With regard to non-residential parking, the standards for <i>General/Special Industrial</i> use as set out in Appendix 3 should be amended to read "<i>Parking and servicing requirement to be demonstrated and provided off street (unless there is a sound planning reasons for providing on street) in accordance with the London Plan</i>". For sports and leisure complexes the provision of coach parking should be as directed by the London Plan to reduce congestion and</p>	<p>Comments noted. No change proposed. The Council considers that the Mayor's Parking Standards that are set for the whole of London do not fully reflect the local circumstances, especially in Outer London and parts of Richmond borough, where there is a need to allow authorities to adopt a more flexible approach in areas up to PTAL 3, rather than only 0-1 and within limited parts in PTAL 2.</p> <p>It is therefore acknowledged that the parking standards for vehicles as set out in Appendix 3 of the Local Plan provide slightly more flexibility compared to the London Plan. However, it should be noted that the test is one of 'general conformity' and overall the Council considers its parking standards to be broadly in line with and therefore in 'general conformity' with the London Plan. The flexible approach in areas of PTAL 1a-1b is entirely consistent with the London Plan. The local standards allow for some additional flexibility in PTALs 2 and 3. This is supported by the Council's detailed evidence base as set out in the Parking Standards Research (2016), in line with the criteria set out in paragraph 39 of the NPPF for setting local parking standards, which provides the local justification. To date, no further details have been provided to the Council by Transport for London (TfL) and it appears that TfL has not yet considered the borough's thorough and robust evidence and local justification.</p> <p>In addition, the Parking Standards Research (2016) included an assessment of options against 3 key sustainability</p>

improve visitor safety.

Electric Vehicle Charging Points (EVCPs) and provision for Blue Badge parking at residential and non-residential development should be in line with London Plan standards. Policy LP45 should be amended to state '*Electric vehicle charging points will be in accordance with London Plan standards*'.

Cycle Parking

Cycle parking is proposed in accordance with the minimum London Plan standards and is therefore compliant with policy 6.9. Freight and Servicing The provision of appropriate servicing arrangements for all new development in policy LP45 is welcomed by TfL. This will help to minimise impacts on congestion and safety for other road users in line with London Plan policy 6.14. The Local Plan states that a range of techniques and facilities will be used as tools in minimising the impacts of freight and servicing. In order to meet the Mayors aspirations for Healthy Streets in his 'A City for All Londoners' document it is suggested that this could include the following elements:

- Providing unattended delivery facilities in residential developments;
- Promoting the use of existing construction consolidation centres;
- Exploring the range of consolidation options for new developments (ranging from click and collect, procurement led, physical consolidation centres, etc.); and
- Noise mitigation to be incorporated into building design and delivery operations to facilitate out of hours delivery.

objectives. This showed that each option is anticipated to have a mixture of positive and negative effects. It demonstrates that the adopted London Plan standards are anticipated to have a balanced outcome by favouring sustainable transport but increasing car dependency and environmental implications. In contrast, the standards that are now incorporated in the Local Plan are expected to result in the greatest net benefits; although it will slightly increase car dependency and environmental implications, it will significantly favour the local highway network by reducing on-street parking pressures and improving highway safety. Note that the alternatives for Policy LP 45 have been subject to Sustainability Appraisal.

245	58	Matt Richards , Bidwells on behalf of Curzon St Ltd	Policy LP 45 Parking Standards and Servicing	Yes	No	Yes			Yes	Yes	<p>We write on behalf of the owners of The Quadrant, Richmond to make representations in respect of the public consultation regarding the Richmond Local Plan Review, including proposed changes to the Proposals Map. The Quadrant office building, the NCP car park and the retail parade occupies an important location in Richmond Town Centre, adjacent to the railway station. The site forms part of a wider allocation at the Richmond Station that proposes a comprehensive redevelopment of the area to improve the transport interchange and increase retail and employment floorspace. This letter sets out our representations in relation to employment and town centre draft policies; parking draft policies; and the proposed allocation for the station site. We are of the view that some further consideration needs to be given to a selection of policies to positively plan for the site's future in a sustainable manner. See Appendix (3) to this document for site location plan, with client's site edged in red.</p>	<p>Policy LP 45 Parking Standards and Servicing</p> <p>We are supportive of proposals that encourage opportunities to minimise car parking and acknowledgment that car free housing development may be appropriate in locations with high public transport accessibility, such as areas with a PTAL of 5 or 6.</p> <p>One of the Core Planning Principles, contained at Paragraph 17 of the NPPF encourages the effective use of land by reusing land that has been previously developed (brownfield land).</p> <p>Planning Practice Guidance (ref. 003 Reference ID: 2b-003-20140306) acknowledges that town centre strategy should be based on evidence and opportunities to meet development needs and support their viability and vitality. The Guidance continues this should include considering expanding centres, or development opportunities to enable new development or redevelop existing under-utilised space. In accordance with the NPPF it is recommended that the proposed policy should recognise that in highly sustainable locations, such as town centres, car park sites (previously developed) could be released for redevelopment. The release of car park sites within town centre locations could result in the effective 'reuse' of the previously developed land, consistent with the NPPF.</p> <p>Policy LP45 should therefore include flexibility to allow car park sites in highly sustainable locations to come forward for redevelopment for town centre uses, in accordance with the NPPF and the NPPG. The draft policy provisions to encourage economic development within Richmond town centre and this site are supported in principle, however some detailed changes are sought to enable the effective delivery of such development moving forward.</p> <p>These changes are considered necessary to make the Local Plan consistent with national policy and effective and thereby meet the tests of soundness set out in paragraph 182 of the NPPF.</p>	<p>Comments noted. No changes required. Paragraph 11.2.4 states that within the main centres, further expansion of car parking (particularly within Richmond) will be limited. This Local Plan did not consider proposals for releasing car parks and no wider parking research including availability of facilities and uptake within the borough and its centres has been undertaken.</p> <p>Should a proposal come forward for Richmond centre, such as to release the NCP car park for redevelopment, then this would need to be considered under the normal development management processes. The applicant would need to demonstrate that it is an under-utilised existing car park and that there is sufficient space in other Richmond car parks to help maintain the viability and vitality of the centre. This is likely to require a survey to be carried out to gather information on the current usage of the car park during operational hours and availability of parking spaces elsewhere.</p>
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306	237	Neil Henders on, Gerald Eve LLP on behalf of Reselton Properties Ltd	Policy LP 45 Parking Standards and Servicing (and associated Appendix 3)	No	No	Yes			Yes	<p>See also Publication Local Plan Comment ID 294</p> <p>Since the submission of our last representations, the Council has published its proposed parking standards.</p> <p>Although we welcome that, for a variety of land uses, the parking standards outlined in the Draft Local Plan have been aligned with standards set out in the London Plan, it is noted that the Council's proposed residential parking standards conflict with the adopted London Plan policies. Whilst the London Plan encourages the provision of low levels of parking (albeit in locations with good accessibility to public transport services), the Council's standards encourage the provision of parking towards the maximum permitted level (albeit in areas with poor accessibility to public transport services), which allow for a far greater provision of parking compared to the London Plan maximum requirements, as set out as follow:</p> <p>See Appendix 19 in this document for a copy of the table referenced above. Appendix 19 also includes a copy of their Pre-Publication Consultation Representation submission.</p> <p>With respect of non-commercial uses, we should also note that the parking standards as set out within Appendix 3 are in excess of those set by the London Plan.</p> <p>Moreover, the new proposed parking standards are based on evidence provided within the 'Research to Support the London Borough of Richmond-upon-Thames' Review of the Local Parking Standards' report prepared by AECOM (August 2016). This report found that more generous standards resulted in higher car ownership levels, in line with TfL's research. It should be noted here that the average car ownership levels within the borough stands at 1.06 vehicles per dwelling, according to the report. Whilst the parking standards are based on this research report the recommendations do not appear to tie in with the car ownerships and some parking utilisations e.g. the report reviewed the parking utilisation at the residential development of Wadham Mews, which provides a parking ratio of 0.89 spaces per dwelling. The report suggested that the maximum parking accumulation at this development was 85%. This appears to suggest that a considerably lower parking provision than set out in the new standards still overprovided parking by 25%. Therefore, it is considered that the parking standards need to be flexible enough to address areas of high public transport accessibility, low car ownership and the existence of Controlled Parking Zones.</p>	<p>Comments noted. No change proposed. The Council considers that the Mayor's Parking Standards that are set for the whole of London do not fully reflect the local circumstances, especially in Outer London and parts of Richmond borough, where there is a need to allow authorities to adopt a more flexible approach in areas up to PTAL 3, rather than only 0-1 and within limited parts in PTAL 2.</p> <p>It is therefore acknowledged that the parking standards for vehicles as set out in Appendix 3 of the Local Plan provide slightly more flexibility compared to the London Plan. However, it should be noted that the test is one of 'general conformity' and overall the Council considers its parking standards to be broadly in line with and therefore in 'general conformity' with the London Plan. The flexible approach in areas of PTAL 1a-1b is entirely consistent with the London Plan. The local standards allow for some additional flexibility in PTALs 2 and 3. This is supported by the Council's detailed evidence base as set out in the Parking Standards Research (2016), in line with the criteria set out in paragraph 39 of the NPPF for setting local parking standards, which provides the local justification.</p> <p>In addition, the Parking Standards Research (2016) included an assessment of options against 3 key sustainability objectives. This showed that each option is anticipated to have a mixture of positive and negative effects. It demonstrates that the adopted London Plan standards are anticipated to have a balanced outcome by favouring sustainable transport but increasing car dependency and environmental implications. In contrast, the standards that are now incorporated in the Local Plan are expected to result in the greatest net benefits; although it will slightly increase car dependency and environmental implications, it will significantly favour the local highway network by reducing on-street parking</p>
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The policy requirement may not reflect the actual need of the development taking into consideration predicted parking need generated from the development of potential schemes to encourage more sustainable modes of travel such as through the use of Travel Plans, car clubs, public transport enhancements etc. There is a danger that the adoption of higher parking standards can create a number of consequences including increased pressure on the highway networks, poor public realm and even result in large areas of land being designated to unused car parking spaces. This does not represent good planning and does not deliver maximum benefit for local communities from land and development.

The high residential parking standards appear to be in contrast with aspirations outlined in -

- Policy LP44 Sustainable Travel Choices, which aims to **"minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions"**, as well as

- Policy LP45 Parking Standards and Servicing, which requires **"new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment, and ensuring making the best use of land"**.

Notwithstanding the existence of on-street parking constraints in the borough, given the evidence presented in the parking research report and the Council's aspirations as set out in draft Policy LP 44 and LP 45, it is difficult to understand the reasoning for parking standards that dictate the provision of a large volume of parking for residential developments, rather than ensuring a flexible approach based on site circumstances.

Although it is clear to see how Policy LP 44 accords with national and regional policy, it is less clear how high parking standards do. The NPPF sets out that a presumption in favour of sustainable development **"should be seen as a golden thread running through both plan-making and decision-taking"** (para 14). One of the three components of sustainable development is environmental, where development should, amongst other aims **"minimize waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy"** (para 7). Policy 6.1 of the London Plan

pressures and improving highway safety. Note that the alternatives for Policy LP 45 have been subject to Sustainability Appraisal.

										<p>sets out a strategic approach for the Mayor to encourage travel methods that "reduce the need to travel, especially by car".</p> <p>We consider that setting high residential parking standards does not allow the Council to work towards encouraging more sustainable modes of travel across the borough, as required by planning policy at national and regional levels.</p> <p>The NPPF states at paras 2 and 151 that Local Plans should be prepared in accordance with the principles of the Framework, which includes a move towards more sustainable travel modes. Furthermore, paragraph 182 sets out that for Local Plans to be considered "sound" they must be "consistent with national policy". Paragraph 0.14 of the London Plan states that "the London Plan can be seen as the expression of national policy for London, tailored to meet local circumstances and to respond to the opportunities to achieve sustainable development here". Therefore it is considered that the parking standards within LBRuT's Local Plan are unsound on the basis that they are contrary to the London Plan, which is seen as the national policy for London.</p>	
315	189	Shaun Lamplough, Mortlake with East Sheen Society	Transport New Policy LP45: Parking Standards and Servicing Page 147, para 11.2.3							<p>MESS comments on Pre-Publication Local Plan, August 2016 - Include a map showing the different PTALs in the borough</p> <p>Council's response to MESS comments, January 2017 - This is available on Transport for London's website: https://tfl.gov.uk/infofor/urban-planning-and-construction/planning-with-webcat/webcat. As the PTAL map may be updated from time to time to take account of public transport improvements and/or changes, it is not considered appropriate to include a map within the plan as this would likely to become out of date very quickly.</p> <p>MESS comments on Publication Local Plan, February 2017 - MESS would still rather see a map than no map at all – it can be the PTAL map at the time of publication with a note saying that it could be updated in the years to follow.</p>	<p>Comments noted. No changes required. The Council maintains its position that it is not necessary for the PTAL map to be included within the Local Plan as this may quickly become out of date. However, a PTAL map is included within the updated Infrastructure Delivery Plan (April 2017). In addition, there is an interactive map on the Transport for London website: https://tfl.gov.uk/infofor/urban-planning-and-construction/planning-with-webcat/webcat</p>

408	169	Brianne Stolper, Greater London Authority on behalf of Mayor of London	Policy: LP 45 Parking Standards and Servicing Parking	No				Yes	<p>The Mayor has carefully considered the Borough's draft Local Plan and whilst he supports many aspects of the plan, he is of the opinion that there remain a couple of outstanding issues that need to be addressed before the Local Plan can be considered as being in conformity with the London Plan. One non-conformity issue concerns parking.</p> <p>Transport for London (TfL) has raised the issue of the proposed parking policy being contrary to London Plan Policy 6.13 and therefore a matter of non-conformity. Please see their comments regarding this and other transport issues in Appendix 1 below <i>[See Publication Local Plan Comment IDs 183 to 192]. [See also Publication Local Plan Comment ID 40 for general/supporting comments made by the GLA on the Publication Local Plan, including references to previous correspondence]</i></p>	Comments noted. No changes proposed. See Officer response to Comment ID 184 (Transport for London) above.
417	73	James Cogan, GL Hearn on behalf of Evergreen Investment Retail Company	Policy: LP 45 Parking Standards and Servicing						<p><i>See also Publication Local Plan Comment ID 409 - for preamble and introductory text to this representation</i></p> <p>Policy LP 45 - Parking Standards and Servicing</p> <p>3.32 Policy LP 45 seeks to ensure that development proposals within the borough meet the vehicular and cycle parking standards set out within the London Plan (2016), and Appendix 3 of the Richmond Local Plan.</p> <p>3.33 Our client supports the objectives of Policy LP 45, and in particular the Council's stance of supporting car free housing development 'in locations with high public transport accessibility, such as areas with a PTAL of 5 or 6', subject to the provision of adequate disabled parking, appropriate servicing arrangements and proper controls to avoid inappropriate on-street parking.</p> <p>3.34 It is strongly contended that Policy LP 45 of the Richmond Local Plan is consistent with the overarching objectives of the NPPF and London Plan (2016).</p>	Support welcomed. No changes required.

53	275	David Cornwell, Strawberry Hill Residents' Association	SA 8 St Mary's University, Strawberry Hill							<p>Further to our initial representations to the consultation draft Richmond upon Thames Local Plan on behalf of the Strawberry Hill Residents' Association, set out in our letter of 9th August 2016, we are writing to formally state our objections to the pre-publication draft document in respect of Policy SA8, St Mary's University, Strawberry Hill and its supporting plan-allocation and text.</p> <p>We reserve the right to add to these add of the Examination in Public (EIP).</p> <p>Since the Pre-Publication consultation, the site allocation in the Local Plan has been extended beyond the campus in Strawberry Hill to include the University's site at Teddington Lock. We have additionally been made aware of the University's plans to build on Metropolitan Open Land on the campus. At the time of writing our earlier letter, we had relied on repeated assurances since 2010 from senior management of the University that any further development on the campus would be only by way of renovation of existing buildings and/or sympathetic redevelopment on the existing building footprint, and possible minor new build encroachments on non-Metropolitan Open Land, in accordance with the restrictive MOL policy which exists across the site. Had we known this was not the case, a far stronger letter of objection would have been submitted to the consultation draft Plan.</p> <p>We had no reason to disbelieve the assurances previously made in light of the section 106 deed between the University and the London Borough of Richmond upon Thames which, inter-alia, commits the University to no further building on Metropolitan Open Land. This was signed by both parties in 2010 following the planning approval for the new sports hall. However, we are now shocked and dismayed to learn that the University's plans involve an approach to the Council to breach the terms of the section 106 deed by proposing to build significant new accommodation blocks within designated Metropolitan Open Land on the campus.</p> <p>In the light of this change and the recently disclosed information on the University's plans we strongly object on four points raised in the site allocation.</p> <p>1. The Potential Additional Growth of University Places</p> <p>Firstly, the site allocation refers to '<i>the need to take account of the growing demand for university places.</i>'</p>	<p>The following extracts should be removed from the Site Allocation:</p> <p><i>"the need to take account of the growing demand for university places"</i></p> <p><i>"a need to provide additional floorspace, student accommodation and other associated facilities."</i></p> <p><i>"the demand for additional teaching, sport and student residential accommodation"</i></p> <p>The section 106 deed should be referred to explicitly in the Site Allocation.</p>	<p>Comments noted. No changes required. The Council is currently liaising with the University on the development of a Masterplan for their estate in the borough. Producing a Masterplan offers the opportunity to consider the University's estates within the borough in a rational and comprehensive way; identify what could reasonably and sustainably be accommodated on its sites; set the parameters against which future development would be assessed; allow for much greater community engagement than would be possible if the University were to submit a series of individual planning applications; and provide a clear framework against which any future planning applications would be considered.</p> <p>As part of this, the Council will expect a thorough and robust business case to be produced by the University, which the Council will get independently checked and verified by a third party. The business case is expected to outline the demand for additional floorspace and students. Therefore, if and when a development proposal comes forward on St Mary's University, it will need to be assessed against all the policies set out within the Local Plan as well as the London Plan and NPPF, including policies on Green Belt and Metropolitan Open Land.</p> <p>In relation to the S106 agreement, it should be noted that this does not relate to the whole site and it did not ban the entirety of 'development' as defined in the Town and Country Planning Act 1990. It is considered that it is regarded as removing the permitted development rights as it would not be appropriate and contrary to planning legislation to wholly sterilise land for future development and not to allow a reappraisal of changed circumstances. It should also be noted that an application under section 106A, or an appeal under section 106B, could be made by the University to vary the existing S106 agreement.</p>
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We do not accept there is a need, nor that any such need is so compelling to warrant exceptional/ very special circumstances to warrant setting aside the policies of the MOL. All the current indications are that the university and higher education market is in fact shrinking with pressure on places reducing in coming decades as a result of the following factors - the UK's demographics showing a reduced university age population; the impact of tightening immigration rules on foreign students; the impact of the UK's departure from the European Union; the increasing debt burdens on student from tuition fees, accommodation and other living costs, allied to increasing realisation that for large numbers of students there is no longer a graduate salary premium; increasing numbers of high quality apprenticeships offered by major firms from the age of 18, including professional firms, making it an attractive way into the jobs market with immediate earnings and no debt; the government proposal to establish a series of post-18 Institutes of Technology to provide a technical rather than academic education, more suited to the Country's needs and the aptitudes of many students; and the levying of the new apprenticeship tax on employers.

All these factors point towards a shrinking demand for academic university provision, not an increase and certainly not as any justification for the further destruction of MOL at the location recognised for its open and environmental benefits such as exists on the Strawberry Hill campus.

A site plan based on a flawed premise of growth in demand for its facilities does not justify very special circumstances/ the exceptional case to set aside the primacy of MOL policy. It is we believe not in the long term interests of the University, and most certainly not in the interests of the residents of Strawberry Hill, leading at best to underutilised facilities and the destruction of the unique open environment of the campus and surroundings and at worst those facilities being rented out for use by third parties for other business, conference or hotel type uses. It will result in unacceptable intensification.

The loss of precious MOL for needs that currently do not exist and are unlikely to exist in the foreseeable future is completely unacceptable to the residents of Strawberry Hill.

This sentence should be removed from the Site Allocation.

2. The "Need" to Provide Additional Floor Space

Secondly, the site allocation refers to '*a need to provide additional floorspace, student accommodation and other associated facilities.*'

We believe such need is overstated, and in light of our comments above, we do not accept there is any need for the University to do more than upgrade its existing building infrastructure on its current built footprint, nor that this warrants exceptional circumstances to circumvent the site's MOL protection.

We are particularly surprised by the view the University has expressed to us that it needs more student accommodation on campus for its existing student numbers. This purported need seems highly questionable in the context of increasing numbers of students living at home or with family because of the high cost of students halls (over 42% of students at St Mary's University according to its latest travel survey in 2014), and an independent survey of student satisfaction with accommodation showing St Mary's University ranking 8th out of 127 universities in the league table.

If there is any need it should be minor and achieved by upgrading on the existing built footprint or on the small amount of available non-MOL on the campus which, in principle, we should have no objection to, as long as it was carried out sympathetically.

The above phrase should be removed from the site allocation together with the later reference to '*the demand for additional teaching, sport and student residential accommodation*' which appears towards the end of the document.

3. Recognition of Site Constraints

Thirdly, we note that the site allocation refers to site constraints but does not explicitly refer to the Section 106 deed under which the University and the Council agreed that there should be no further development on the campus within the MOL. This is at best an oversight and at worst misleading, given the relatively recent nature of the document.

Reference to this should be included in the site allocation as it represents an important consideration and constraint on the site, and one which the residents relied on, and continue to do so to preserve the openness and vistas on

the site, both of which they value highly.

The MOL should continue to endure and any further erosion goes against not only the policy presumption in principle against the development of such land but also the spirit in which the Council and University has sought to reassure local residents in the Strawberry Hill area that the long term protection of the MOL should be paramount in any further proposals for development of the campus.

To clarify, we do not believe there are compelling reasons either to set aside MOL policy or the signed S106 and that any new development should take place only on the existing footprint of building on campus and/or by way of minor encroachments on non-MOL land.

4. Transport issues

Fourthly, there has been little regard to the extra traffic and parking that would be generated by the proposed substantial increase in student and staff numbers. A great many students now have private cars and parking is already a major concern of local residents as a result of the current inadequacy of available parking to meet the needs of residents and the large number of students and staff travelling to the University by car. Too many cases are already brought to the areas by students and staff, as evident from the current pressure from local residents in many streets around the University for a CPZ to be introduced, or where a CPZ already exists, for the hours to be extended. Unless the University gets to grips with the problem of students bringing cars, the solution of implementing further and more restrictive CPZs will only push the problem out to more distant streets. Student commuting should be restricted by St Mary's to those such as disabled students and those with a proven travel need that cannot be met by public transport.

The necessary transfer of students and staff from cars to public transport allied to the proposed significant increase in numbers of both students and staff will inevitably call into question the adequacy of the public transport infrastructure to cope at peak travel times.

The University has yet to produce a travel plan which deals with the capability of the infrastructure to deal with the increased numbers travelling to and from the campus and between the campus and Teddington Lock. Movements between these two University sites will be greatly increased not only by the rise in student numbers, but also by the proposed transfer of many sporting activities from

									<p>the campus to Teddington Lock. This needs to be done before <u>any</u> further development or intensification is considered.</p> <p>Other comments</p> <p>As a final comment we would add that at the Leader's Question Time event on 11th January 2017 to launch the Strawberry Hill Village Plan , it was made perfectly clear by a large and vocal section of the residents of the village that the University's plans to grow student numbers and build on MOL on the campus are not supported by the local community. The residents expect the Council to honour the deed they signed to protect this valuable asset.</p> <p>We would welcome any comments you may have on these representations and would be grateful if these objections can be registered against Policy SA8 and supporting paragraphs of the draft Plan. We reserve the right to add to these ahead of the EIP.</p>		
407	169	Brianne Stolper, Greater London Authority on behalf of Mayor of London	Site Allocations (all relevant) SA 8 St Mary's University, Strawberry Hill	No				Yes	<p>The Mayor has carefully considered the Borough's draft Local Plan and whilst he supports many aspects of the plan, he is of the opinion that there remain a couple of outstanding issues that need to be addressed before the Local Plan can be considered as being in conformity with the London Plan. One issue relates to the inclusion of Site Allocation SA 8 St Mary's University, Strawberry Hill, the majority of which is designated as Metropolitan Open Land.</p> <p>As noted previously, a number of Richmond's site allocations have open space and MOL designations and the Mayor stated that he would like to protect these from development. MOL is afforded the same level of protection as Green Belt and London Plan Policy 7.17 requires any alterations to the boundary of MOL to be undertaken through the Local Plan process and in consultation with the Mayor. The London Plan directs boroughs to refuse inappropriate development in MOL except in very special circumstances.</p> <p>Policy SA 8 - St Mary's University, Strawberry Hill is allocated for development of new student accommodation and learning facilities as well as the refurbishment and upgrading of existing buildings and landscaping. The majority of the site is designated as Metropolitan Open Land. Any development that is built on the MOL part of the site and is not an appropriate use will be considered inappropriate development. The approach of retaining the MOL designation but allocating the site for</p>	<p>The Council should either use the proper planning approach and de-designate the site or remove the site from the draft Plan and allow the proposal to go through the application process, which would require demonstration of very special circumstances in line with London Plan policy 7.17B.</p>	<p>Comments noted. No changes proposed. The GLA has been invited to make representations throughout the preparation of this Plan. However, it was not until the response was received by the Mayor of London on the Regulation 19 consultation that the Mayor raised 'non-conformity' issues in relation to SA 8. The proposal site SA 8 has only been subject to very limited changes and updates since the Regulation 18 consultation, where the Mayor did not raise specific issues relating to this site. Policy SA 8 acknowledges that this is a very constrained site (<i>NB: 77% of the campus is designated as MOL</i>). The Council is liaising with the University on the development of a Masterplan for their estate in the borough. Consultations on ideas and options for development, which were led by the University and which took account of MOL constraints, were carried out earlier in 2017. The latest consultation (spring 2017) considered increased densities on land not designated as MOL and reducing the size of built facilities and floorspace to the absolute minimum necessary to ensure efficiency. It should be noted that there are</p>

									development in MOL is not in conformity with the London Plan. See also Publication Local Plan comment, Objective ID 401, for general/supporting comments made by the GLA on the Publication Local Plan, including references to previous correspondence.		currently no specific development proposals or planning applications for consideration for this site. To date, St Mary's University, in co-operation with the Council, have shared some of the ideas and options in terms of how the St Mary's University estate could be developed with GLA officers. Policy SA 8 states that the existing site constraints will need to be taken account of, with the aim of improving and enhancing the MOL. There is considerable scope to increased densities and efficiencies in land not designated as MOL. Therefore, the Council believes that SA 8 is in 'general conformity' with the London Plan. In addition, it should be noted that the Plan needs to be read as a whole and any planning application on this site would need to be fully considered against all the policies in the development plan, including on MOL and Green Belt.
255	69	Samantha Powell, Education Funding Agency	Site Allocations: Richmond Local Plan proposals for school locations						The following sites are identified at 8.2.11 and within section 12 (Site Allocations) for educational uses as part of the Local Plan: - SA9: Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college - SA24: Stag Brewery, Mortlake: provision of a new 6-form of entry secondary school, including sixth form - SA17: Ryde House, East Twickenham: provision of a new 2-form of entry primary school (recently granted planning permission) - SA27: Barnes Hospital, Barnes: provision of 2-form of entry primary school The EFA supports the identified sites and welcomes the commitment to work with the EFA, Department for Education, landowners and other partners to identify and allocate sites for the future provision of schools. Where specific locations for other schools have not yet been identified the EFA suggest that the Local Plan sets out the mechanism through which sites will be identified and secured, and is willing to assist in this process.	The EFA recommend land off Hospital Bridge Road also be allocated for education use; a plan identifying the location of the site is included below (See Appendix (4) in this document for the image). Whilst the site is on Metropolitan Open Land, the school is located in an area where sites are very difficult to acquire. The EFA has undertaken extensive site searches and not identified any suitable alternative sites. Very special circumstances are considered to apply in this case, as there is an identified need for additional school places. The Turing House School is currently open in temporary accommodation on a site in Teddington and will outgrow its temporary accommodation before the beginning of the 2018 academic year. The Hospital Bridge Road site is well located in respect of existing need and considered suitable for the development of a school. The proposed school also has an approved Trust, The Russell Education Trust, which has an excellent track record in delivering education. It is proposed that the site will accommodate a mainstream secondary school for ages 11-19, which will accommodate 1050 places at full capacity.	Comments in relation to 8.2.11 are noted. It is acknowledged that Turing House School is already an established school in the borough, which is currently in temporary accommodation. If a proposal for a school comes forward on the land off Hospital Bridge Road, which is designated MOL, it will need to be assessed against all the policies set out within the Local Plan as well as the London Plan and NPPF, including policies on Green Belt and Metropolitan Open Land. It is therefore considered that this is not a Local Plan matter, but that it will be for the developer/applicant to demonstrate as part of the planning application process that 'very special circumstances' exist that may outweigh harm to Green Belt / MOL.

281	264	Vicky Phillips, South West London Environment Network	Site Allocations - we have comments on individual sites. SA 5, 9-12	No				Yes			SA5 Teddington Telephone Exchange - amend to read "retaining and enhancing the open area" at the front of the building. This area is currently neglected but could be improved to considerably enhance the street scene of Teddington High Street with planting for visual appeal and biodiversity. SA9 Richmond upon Thames College, SA10 Harlequins, SA11 Twickenham Stadium - remove the words "where possible" to bring the wording in line with policy LP18A. Include a similar policy in relation to SA12 Mereway Day Centre as it is adjacent to the River Crane.	Comments noted. In relation to SA 5, a minor change is proposed in light of Historic England's comments: "The site is within the High Street Teddington Conservation Area and any redevelopment proposal will need to <i>respect its character</i> and the settings of the listed buildings on the opposite side of the High Street." In relation to the reference "where possible", it should be noted that this refers to the enhancements only. The policy on River Corridors LP 18 is clear that any development proposal is required to protect the River Crane corridor; therefore, the reference 'where possible' only applies to enhancements. No changes required.
399	266	Dale Greetham, Sport England	Site Allocations	No						Please see Sport England's comments are previously submitted. These remain relevant and valid. <i>Please see Appendix 21 in this document for a PDF version of the comments referenced above.</i>	It is noted that Sport England requests the application of the Sport England policy and paragraph 74 of the NPPF in relation to the site allocations that affect playing fields (i.e. SA8, SA9, SA10, SA11, SA15, SA16, SA17, SA21, SA22 and SA27). The site allocations seek in general the protection, retention and/reprovision of the playing fields and the Council expects any scheme coming forward on these site allocations to apply the relevant Sport England and NPPF policies, as well as the policies set out within the London Plan and Local Plan. It should be noted that there are no sports or playing fields on SA16, SA17, SA21 and SA27. No changes required.	

420	285	David Wilson, Savills, on behalf of Thames Water Utilities Ltd	Section 12.1 Site Allocations							<p>As you will be aware, we previously supported Policy LP23, but raised some water supply/sewage infrastructure issues in relation to some of the Proposed Housing Sites. As previously indicated, I can confirm that we do not object to housing sites in principle or the soundness of the Local Plan in this respect, but wanted to raise the specific concerns regarding some of the sites in relation to water and sewerage infrastructure. These concerns still remain valid (and therefore we re-attach the table of site specific comments), but as previously indicated the water/wastewater infrastructure issues should be covered by the requirements of Policy LP23.</p> <p>None of the proposed allocations have housing figures provided which makes it difficult to comment on whether we anticipate infrastructure upgrades will be required or not. We will require information on the scale and phasing of the developments to make more detailed assessment, but expect this will be available as part of the application process.</p> <p>Due to the complexities of water and waste/sewerage 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 infrastructure.</p> <p><i>See Appendix 26 in this document for a copy of the table referenced above.</i></p>	<p>To enable Thames Water 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 discuss the water infrastructure needs relating to the Local Plan.</p>	<p>Comments noted. No changes required. It is considered that water sewerage infrastructure requirements are adequately addressed in Policy LP 23, which ensures that there is adequate water supply, surface water, foul water drainage and sewage treatment capacity to serve a development, or that extra capacity can be provided in time to serve the development, prior to new development being permitted. Note that at this point in time, indicative ranges for housing unit numbers are not available for the site allocations. However, it is expected that all applicants and proposals coming forward for the site allocations fully comply with LP 23.</p>
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271	222	Kevin Scott, Kevin Scott Consultancy Ltd on behalf of Port Hampton Estates Limited	SA 2 Platts Eyot, Hampton							<p>We represent the owner of Platts Eyot, Port Hampton Estates Limited. We wish to make the following comments on the Local Plan Public Publication document published for consultation in January 2017. These comments should be read in conjunction with the comments made to the pre-publication version in July 2016 included in Appendix 1.</p> <p><i>See Appendix 16 in this document for a copy of the appendix referenced above.</i></p> <p>Policy SA 2</p> <p>This policy relates to the specific allocation of Platts Eyot. This policy has been revised :</p> <p><i>“Regeneration of the island by maintaining, and where possible enhancing, existing river-dependent and river-related uses. New business and industrial uses (B1, B2 and B8) that respect and contribute to the island’s special and unique character are encouraged. Residential development to enable the restoration of the Listed Buildings, especially those on the Heritage at Risk Register, may be appropriate.”</i></p> <p>The supporting text also supports:</p> <ul style="list-style-type: none"> - Retention of the unique employment and business uses - Improvement and enhancement of listed buildings and the conservation area - Enabling residential development - Safe access and egress to and from the site during times of flooding - Preparation of a masterplan <p>Following our representations in July 2016, we support the addition to this policy relating to vehicular access to the site.</p>	Comments noted. Support welcomed.
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350	113	Katharine Fletcher Historic England	SA 2 Platts Eyot, Hampton								<p>See also Publication Local Plan Comment ID 340.</p> <p>We welcome the amendments made in response to Historic England’s previous comments to strengthen the references to relevant heritage assets within, and adjoining, many of the sites. The significance of the heritage assets in some cases is such that we request that direct reference is included within the highlighted policy, as has been done for some sites already. We also recommend that all sites that fall within, or partially within, Archaeological Priority Areas should include reference to the APA. This will ensure the effectiveness of the policy in relation to the generic development management policy, LP 7. We highlight the APAs for each site below, and also in the attached schedule.</p>	<p>The second bullet could be re-worded for clarity to read: ‘<i>Of the five listed buildings on Platts Eyot, four are on the Heritage at Risk Register, as well as the conservation area covering the island. There is a need to ensure that these designated heritage assets, and the wider character of the island, are improved and enhanced</i>’</p> <p>A new bullet point is needed highlighting that the site lies within an APA and that policy LP 7 applies. (See Appendix 8 to this document for the schedule of GLAAS comments)</p>	<p>Comments noted. Whilst the Council considers that the second bullet point is sufficiently clear, a minor re-wording could be accommodated as follows: <u>“Of the five listed buildings on Platts Eyot, four are on the Heritage at Risk Register, as well as the conservation area covering the island. There is a need to ensure that these designated heritage assets, and the wider character of the island, are improved and enhanced.”</u></p> <p>In relation to including a reference to LP 7, the Council considers that it is not helpful to state that a particular policy would apply, such as LP7, because the assumption is that all policies within the Local Plan and other related adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan. This is also specifically stated within paragraph 12.1.6 of the Local Plan to avoid the need for cross-references.</p>
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289	296	Greg Pitt, Barton Willmore on behalf of UK Pacific Hampton Station	SA 3 Hampton Traffic Unit, 60-68 Station Road, Hampton	[REPRESENTATION CONTAINS APPENDIX]	We would therefore like previous Site Allocation HA9 (LBRuT's Pre-Publication Site Allocations Plan – New Additional Sites (June 2014)) re-instated and the Site allocated for residential use because the Site has clearly become surplus to the requirements of the Metropolitan Police Service (MPS) and disposed of accordingly.	Comments noted. It should be noted that 16/0606/FUL was approved by LBRuT Planning Committee on 5 April 2017, subject to completion of a S106 agreement. A legal agreement is in drafting, to provide environmental and highway improvements and an exemption from parking permit eligibility and a review of affordable housing viability.																	
<p>We write on behalf of our client, UK Pacific Hampton Station LLP, in respect of the London Borough of Richmond upon Thames (LBRuT) ("the Council") formal consultation on the Publication Version of the Local Plan (4th January – 15 February 2017). Our client has submitted a planning application (16/0606/FUL) for the redevelopment of the Former Hampton Traffic Unit, 60 to 68 Station Road ("the Site") on the 15th February 2016 following a comprehensive period of pre-application consultation. We have also had considerable negotiations with your development management team following submission of the planning application. For clarity, the submitted planning is for:</p>			<p><i>Retention of former police station building with partial demolition of the rear wings of the police station, demolition of the rear garages, construction of 28 residential units (4 x 1 bed, 12 x 2 bed, 10 x 3 bed and 2 x 4 bed) and associated access, servicing, car parking, cycle parking and landscaping ("the Proposed Development").</i></p>			<p>Draft Site Allocation Policy SA3 'Hampton Traffic Unit, 60-68 Station Road, Hampton' states the following:</p>			<p><i>Appropriate land uses include business (B1), employment generating and other commercial or social and community infrastructure uses. The Building of Townscape Merit should be retained and a pedestrian link should be provided through the site.</i></p>			<p><i>We strongly object to this statement and indication of <u>potential allocation/use</u> for the reasons previously set out in our representations on the village plan (see attached) and set out below.</i></p>			<p><u>Soundness - Compliance with National Policy</u></p>			<p>As set out within the National Planning Policy Framework (NPPF) (March 2012), paragraph 182 requires Local Plans to be 'sound' and two of the tests of 'soundness' is compliance with national policy and 'deliverability'.</p>			<p>Whilst we note a viability appraisal has been prepared to support the Local Plan, we question the joint working that has taken place within LBRuT regarding the proposed Site Allocation SA3. We have worked tirelessly with your development management colleagues and conservation/urban design officer to ensure that the Building of Townscape Merit (Police Station) can be</p>		

protected and enhanced to a greater extent than initially envisaged. This coupled with the onsite contamination from the sunken oil drums has threatened the viability of a residential scheme to be delivered and the ability for the scheme to provide appropriate returns to the developer even with no affordable housing provision. Given the returns from a residential development are barely viable because of the policy burdens, we consider that the proposed uses (business, employment, commercial, social and community) would not be deliverable.

We therefore consider that the Draft Site Allocation does not comply with paragraph 173 in the NPPF which states the following:

173. Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

Summary

In summary, we strongly object to the suggestion that the Site should be developed for 'Employment generating and other commercial or social and community infrastructure uses'. This policy aspiration is not deliverable and it is therefore considered that Draft Site Allocation Policy SA3 'Hampton Traffic Unit, 60-68 Station Road, Hampton' is not deliverable. We therefore consider that the use of the Site should be updated to residential use as highlighted.

201	42	Alan Cartwright	SA 5 Telephone Exchange, Teddington	Yes	Yes	No	Yes	Yes	Yes	Yes	<p>The Proposal's Plan for the site of the Telecommunications building on the site between 88-100 High Street Teddington proposes the site should have low cost housing above retail or office development. My concern is about the provision of car parking for the housing. In planning law developers do not have to provide OFF STREET car parking because the site is in walking distance of a main line railway station. If it is not stipulated as a requirement to provide ON SITE parking for residents, it will put local resident parking spaces into turmoil.</p> <p>I have spoken at length to local retail outlets in the Area and the one type of premises they do not want on the ground is a SUPERMARKET. It is undesirable and a threat to the elderly and people of special needs due to the increase in motorised traffic and the restrictions of the site. Most people would like it to include a cultural centre of some kind not coffee shops etc.</p>	<p>Comments noted. The provision of parking and other potential transport impacts will need to be considered as part of the development management process. No changes required.</p>	
351	113	Katharine Fletcher, Historic England	SA 5 Telephone Exchange, Teddington								<p>See Publication Local Plan Comment IDs 340 and 350.</p>	<p>In bullet 7, we recommend that it should read <i>"The site is within the High Street Teddington Conservation area and any redevelopment proposal will need to <u>respect its character and the settings of the listed buildings ...</u>"</i></p> <p>A new bullet point is needed highlighting that the site lies within an APA and that policy LP 7 applies. (See Appendix (8) to this document for the schedule of GLAAS comments)</p>	<p>Agree with the proposed amended wording. Amend bullet point 7 of Policy SA 5 to read as follows: "The site is within the High Street Teddington Conservation Area and any redevelopment proposal will need to '<u>respect its character</u>' and the settings of the listed buildings on the opposite side of the High Street."</p> <p>In relation to including a reference to LP 7, the Council considers that it is not helpful to state that a particular policy would apply, such as LP7, because the assumption is that all policies within the Local Plan and other related adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan. This is also specifically stated within paragraph 12.1.6 of the Local Plan to avoid the need for cross-references.</p>
352	113	Katharine Fletcher, Historic England	SA 6 Teddington Delivery Office								<p>See Publication Local Plan Comment IDs 340 and 350.</p>	<p>A new bullet point is needed highlighting that the site lies within an APA and that policy LP 7 applies. (See Appendix (8) to this document for the schedule of GLAAS comments)</p>	<p>Comments noted. The Council considers that it is not helpful to state that a particular policy would apply, such as LP7, because the assumption is that all policies within the Local Plan and other related adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan. This is also</p>

5	60	Sarah Dietz	SA 7 Strathmore Centre, Strathmore Road, Teddington	Yes	No	Yes								I am pleased to see that the importance of Scamps has been recognised but I am disappointed to see that the proposal does not safeguard the outside space which is vital to Scamps effective operation. Scamps looks after a wide age range of children and is successful because of the different environments the children are able to easily switch between - they offer variety of activities and social interaction spaces. The children choose when and how they use these spaces, they are able to because supervising staff can easily transfer from one space to another. Restricting access to outside space would be severely detrimental. For example, suggesting that Scamps can use the newly constructed playground on Stanley Rd it not feasible as staff would have leave the main campus, walk children to the site for a specific period of time and then transfer back. This is simply not practical with children arriving at different times due to after-school clubs and being picked up at different times. It also removes the sense of freedom and spontaneity the children have at Scamps. It should be noted that with the increasing student numbers at Stanley that the Scamps service is in great demand by parents. It would be scandalous if this provision was reduced or restricted due to redevelopment.	Please ensure wording is changed to reference and protect the outside space used by Scamps.	Comments noted. The Council considers that the broad approach to SA 7 is sufficiently detailed about the nature and scale of development, in line with national planning guidance. The important contribution that the child-care services provide at this location is recognised. Policy SA 7 states that proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way (which is intended to refer to re-provision 'on this site') or elsewhere in a convenient alternative location accessible to the current community it supports. This policy approach is also consistent with Policy LP28.C. It should be noted that this is a Council owned site and relevant Council officers are liaising and engaging with the current nursery provider to explore the options for this site. No changes required.
30	147	Krystyna Kujawinska	SA 7 Strathmore Centre, Strathmore Road, Teddington		No									I'm commenting on behalf of SCAMPS - the child-care service located at SA 7 Strathmore Centre, Strathmore Road, Teddington. The description of the best land use states: Social and community infrastructure uses and/or an affordable housing scheme with on-site car parking are the most appropriate land uses for this site. Scamps is a non-profit making childcare service that 200 local families rely on to provide affordable childcare which enables them to go out to work. As stipulated in the detail accompanying the site allocation Scamps is ideally situated to support working parents at Stanley School and St. James owing to its proximity to those schools and to Fulwell Station. However, the above description: Social and community infrastructure uses and/OR an affordable housing scheme are the most appropriate land uses for this site - raises the doubt that Scamps will be re-provisioned on this site and contradicts the stipulation in 8.1.1. about adequate community and social infrastructure being essential and that it is important that these facilities and services meet people's needs at all stages of their lives and are accessible to all. As well as going against the point 8.1.2 about safeguarding land and buildings in educational use. It is important for the Council to note that Scamps (Ofsted-rated Outstanding) exists to serve the local	SA 7 Strathmore Centre, Strathmore Road, Teddington. Remove the word OR from the wording detailing the best use of this land, thereby confirming the necessity to re-provision Scamps on this site.	Comments noted. The Council considers that the broad approach to SA 7 is sufficiently detailed about the nature and scale of development, in line with national planning guidance. The important contribution that the child-care services provide at this location is recognised. Policy SA 7 states that proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way (which is intended to refer to re-provision 'on this site') or elsewhere in a convenient alternative location accessible to the current community it supports. This policy approach is also consistent with Policy LP28.C. It should be noted that this is a Council owned site and relevant Council officers are liaising and engaging with the current nursery provider to explore the options for this site. No changes required.

										community of working parents - it is a NON-profit making organisation with the objective of providing affordable to the local community; it is not a commercial entity.		
31	301	Louise Ware	SA 7 Strathmore Centre, Strathmore Road, Teddington 12.1 Description of site allocation - SA7 Stratmore Centre (Scamps child care provision)	No						As a parent who uses the SCAMPS child care provision located at Stratmore Road I do not believe that affordable housing is the most effective use of the site. The provision for high quality (SCAMPS is rated Ofsted: Outstanding) and affordable local child care is an absolute necessity in this area and must be maintained. This affordable and local child care offer enables parents (especially mothers) to return to work. The location, opposite Stanley School and close to St James school, allows quick and safe passage for the children who attend SCAMPS. This is a not-for profit child care facility and is heavily in demand and well used by local residents. By implying that SCAMPS may not be reprovisioned on this site by indicating it may be used for childcare and/OR affordable housing, in my view, should be amended. SCAMPS is of great benefit to the local community, to the parents that rely on it and for the children who are cared for on a weekly basis.	SA7 Strathmore Centre Teddington - confirm that provision for SCAMPS will remain on this site. Amend the wording to remove the word OR from the description of the best use of the site.	Comments noted. The Council considers that the broad approach to SA 7 is sufficiently detailed about the nature and scale of development, in line with national planning guidance. The important contribution that the child-care services provide at this location is recognised. Policy SA 7 states that proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way (which is intended to refer to reprovision 'on this site') or elsewhere in a convenient alternative location accessible to the current community it supports. This policy approach is also consistent with Policy LP28.C. It should be noted that this is a Council owned site and relevant Council officers are liaising and engaging with the current nursery provider to explore the options for this site. No changes required.
3	249	Jane Ryan	SA 7 Strathmore Centre, Strathmore Road, Teddington	Yes	Yes	Yes				This site is essential to parents in the area as it provides childcare facilities that enable parents to return to work after having children and is economic and has safe and suitable staff and environments, including a large outdoor play area, essential for children. I do not believe more housing in this area would benefit the community as much as retaining the current provision, perhaps with improved buildings.		Comments noted. The Council considers that the broad approach to SA 7 is sufficiently detailed about the nature and scale of development, in line with national planning guidance. The important contribution that the child-care services provide at this location is recognised. Policy SA 7 states that proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way (which is intended to refer to reprovision 'on this site') or elsewhere in a convenient alternative location accessible to the current community it supports. This policy approach is also consistent with Policy LP28.C. It should be noted that this is a Council owned site and relevant Council officers are liaising and engaging with the current nursery provider to explore the options for this site. No changes required.

354	113	Katharine Fletcher, Historic England	SA 9 Richmond upon Thames College, Twickenham							<i>See Publication Local Plan Comment IDs 340 and 350.</i>	A new bullet point is needed highlighting that the site lies within an APA and that policy LP 7 applies. (See Appendix 8 to this document for the schedule of GLAAS comments)	Comments noted. The Council considers that it is not helpful to state that a particular policy would apply, such as LP7, because the assumption is that all policies within the Local Plan and other related adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan. This is also specifically stated within paragraph 12.1.6 of the Local Plan to avoid the need for cross-references.
187	288	Sarah Hoad, Transport for London	SA 10 The Stoop (Harlequins Rugby Football Club), Twickenham							<p>This letter follows receipt of the notification that the London Borough of Richmond has undertaken consultation on the publication version of the proposed Local Plan. The following provides relevant updates and commentary on the proposed wording where appropriate, which follows previous consultation in January 2016 and July 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.</i></p> <p>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. The GLA letter makes reference to the need to have regard to TfL’s specific comments in respect of transport and infrastructure.</p> <p>SA10, The Stoop (Harlequins Rugby Football Club) Ongoing collaboration is welcomed between the Council, TfL and third parties for A316 access and network impact. This includes TfL’s significant junction improvement project at the A310 London Road roundabout. The A316 study referred to in earlier responses is applicable for any future development at the site, together with, servicing facilities and a visitor management plan.</p>	Comments noted. No changes required.	

188	288	Sarah Hoad, Transport for London	SA 11 Twickenham Stadium, Twickenham									<p>This letter follows receipt of the notification that the London Borough of Richmond has undertaken consultation on the publication version of the proposed Local Plan. The following provides relevant updates and commentary on the proposed wording where appropriate, which follows previous consultation in January 2016 and July 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.</i></p> <p>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. The GLA letter makes reference to the need to have regard to TfL's specific comments in respect of transport and infrastructure.</p> <p>SA11, Twickenham Stadium, Twickenham Ongoing collaboration is welcomed between the Council, TfL and third parties for A316 access and network impact. This includes TfL's significant junction improvement project at the A310 London Road roundabout. The A316 study referred to in earlier responses is applicable for any future development at the site, together with, servicing facilities and a visitor management plan.</p>	Comments noted. No changes required.
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222	247	Marie Claire Marsh, Lichfield s on behalf of the Rugby Football Union (RFU)	SA 11 Twickenham Stadium, Twickenham	Yes	No	Yes	Yes	<p>Twickenham Stadium is owned by the RFU and has been the national stadium for the England rugby team for over 100 years. The site comprises the 82,000 seat stadium, and uses at ground floor such as a hotel, banqueting and conference facilities, and a gymnasium.</p> <p>Over the past 25 years the RFU has gradually modernised the site to increase seating capacity, improve spectator comfort and meet modern safety requirements.</p> <p>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.</p> <p>The NPPF makes clear (paragraph 182) that for a Local Plan to be considered 'sound' it needs to meet the following tests:</p> <p>1) Positively Prepared: the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements....where it is reasonable to do so and consistent with achieving sustainable development.</p> <p>2) Justified: When considered against the evidence and any reasonable alternatives, the Plan should be the most appropriate strategy to meet the borough's development needs.</p> <p>3) Effective: the Plan should be deliverable over the intended period to 2033, and based on effective joint working on cross-boundary strategic priorities.</p> <p>4) Consistent with national policy: the Plan should enable the delivery of sustainable development in accordance with the NPPF.</p> <p>The proposed Local Plan proposes a site allocation policy for Twickenham Stadium, which is welcomed, however, the policy does not conform with the London Plan (2016) or NPPF (2012) and is therefore not 'consistent with national policy'. The London Plan (2016) states at Policy 3.19 that: "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".</p> <p>The NPPF states at paragraph 8 that "the planning system</p>	<p>Overall, the RFU supports the site allocation policy for the Twickenham Stadium. However, to ensure the Plan is 'positively prepared' and 'consistent with the NPPF' the policy needs to provide more support for the continued use and GROWTH (not simply improvement) of the Stadium, to ensure it remains an international stadium with the facilities and services expected of it.</p> <p>Stadiums across the country are used for multiple purposes, including sporting uses as well as concerts, events and other leisure uses. This diversity in the operation of the stadiums contributes to the economic and social role that the stadium plays within the local community and within the country.</p> <p>In accordance with NPPF Paragraph 7 and 8 we therefore request that the site allocation policy is amended to:</p> <p>- "The Council supports the continued use and growth of the grounds for sports, recreation and leisure uses. Appropriate additional facilities including a new east and north stand, indoor leisure, hotel or business uses, as well as hospitality and conference facilities, will be supported provided that they are complementary to the main use of the site as a sports and leisure ground.</p> <p>In addition, the justification text should state at bullet point four:</p> <p>- "There is a general need for new office floorspace in the borough and in the event of an area of the site being declared surplus to requirements, the opportunity to provide for employment floorspace, such as offices or a business park, should be explored. A mixed use scheme, that may include residential, may also be considered appropriate provided and that the mixed-use is compatible with the main use of the site as a national stadium".</p>	<p>Comments noted and support welcomed.</p> <p>In relation to the changes requested, it is considered that the current policy wording allows for some growth on the site, i.e. appropriate additional facilities, including a new east and north stand, indoor leisure, hotel or business uses, as well as hospitality and conference facilities. The Council will require any proposals and additional uses to be complementary to the main use of the site as a sports ground.</p> <p>It is not considered appropriate to remove the reference to 'affordable housing' within bullet point 4 as this is a general policy requirement (see policy LP 36). In addition, residential uses are generally not considered 'complementary' to the main use of the site as an international stadium and sporting venue. Therefore, the Council will require evidence and justification that other sporting and associated uses, including employment uses, have been fully investigated and explored before a residential use can be considered. No changes required.</p>
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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). The NPPF is clear at paragraph 7 that 'sustainable development' includes the 'economic role' stating that this contributes to "building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation".

Stadiums and their associated facilities and infrastructure are used across the country for multiple purposes, including sporting uses as well as concerts, events, conferences and other leisure uses. This diversity in the operation of the stadiums contributes considerably to the economic and social role that the stadiums play within the local community and within the country. Twickenham Stadium is a national stadium that provides a considerable opportunity for use for multiple purposes. Twickenham Stadium should have a supportive and positive policy within the Local Plan that recognises the distinct advantage that the national stadium facility provides both the Borough and the wider London and south-east area.

The site allocation text states: "The Council supports the continued use and improvement of the grounds for sports uses...". We support the overall inclusion of a site specific allocation for the national stadium within the Local Plan, and the recognition that the Council will support the continued use of the grounds. However, the Plan needs to be more positive in seeking to encourage the continued use and growth of the national stadium. The policy should also fully support the economic and social role that the stadium provides, stating that the Council supports the use of the ground for sports, leisure and recreation uses.

The Council should be using this opportunity with the production of the Local Plan to state within the site allocation policy that they will support appropriate additional facilities on the site, including complimentary commercial uses, in accordance with the requirements of national and London planning policy. This would ensure a 'positively prepared' Plan that is in accordance with national policy by ensuring the Council is supporting the national stadium within their Borough for sports, leisure, recreational uses and complimentary commercial uses. This will help to ensure the positive growth of the facility to help boost the local economy.

In respect of the justification text, it is noted that the

										<p>Council is seeking a policy that helps to respond to circumstances where parts of the site become surplus to requirements. In this scenario, we would request that the policy is not so restrictive. The justification text at point four states that “a mixed use scheme, with residential including affordable housing, may also be considered appropriate provided that...”. The wider site is suitable for mixed-use, including potential residential uses. However, it is not necessary for the policy to seek mixed-use AND residential within a redevelopment scenario, as the appropriate range of mixed-use should be considered and agreed at the application stage. The suitability of residential elements will depend on the location and the type of use being proposed, and the timing in which the land becomes surplus to requirements.</p> <p>Due to the points made above, we do not consider that the Local Plan has been 'positively prepared' as it is not consistent with achieving sustainable development (the economic role). In addition, the Plan is not 'consistent with the NPPF' as the Plan does not suitably plan for sustainable growth development. We therefore do not consider the Plan 'Sound'.</p>		
355	113	Katharine Fletcher, Historic England	SA 12 Mereway Day Centre, Mereway Road, Twickenham							<p>See Publication Local Plan Comment IDs 340 and 350.</p>	<p>A new bullet point is needed highlighting that the site lies within an APA and that policy LP 7 applies. (See Appendix 8 to this document for the schedule of GLAAS comments)</p>	<p>Comments noted. The Council considers that it is not helpful to state that a particular policy would apply, such as LP7, because the assumption is that all policies within the Local Plan and other related adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan. This is also specifically stated within paragraph 12.1.6 of the Local Plan to avoid the need for cross-references.</p>

179	59	Louise Spalding , Defence Infrastructure Organisation	SA 14 Kneller Hall, Whitton Pages 170-171	Yes	No	Yes	Yes	Yes	Yes	<p>DIO welcomes the site allocation policy for Kneller Hall but suggests the following changes. The new policy is shown in section 7 below. The reasons for our changes and comments arises from the following:-</p> <ol style="list-style-type: none"> 1. Make clear recognition of the support for residential on the site provided it is supported by an appropriate mix of other uses. 2. Allow some flexibility for the supporting complementary uses to be discussed further during the preparation of the development brief based on evidence of need and demand to ensure a viable proposition. 3. Ensuring that the scheme provides publicly accessible facilities whilst not placing an undue burden on the development to ensure it is viable, particularly in the context of the need to protect and restore the listed building. We have therefore suggested an amendment to allow for the publicly accessible open space provision to be met by making all or part of the playing fields available to the public. 	<p>The following is the amended site specific policy. SA 14 Kneller Hall, Whitton</p> <p>The site has been declared surplus to requirements. The Council will support mixed use development with residential (including affordable housing) alongside other complementary uses including employment (B uses), employment generating uses (such as a hotel) and as well as social infrastructure uses, such as health, leisure and community facilities. Any proposal should provide for some employment or employment generating floorspace, including B1 offices if feasible. The Council will expect the playing fields to be retained, and the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area.</p> <ul style="list-style-type: none"> • Kneller Hall, is currently occupied by the Royal Military School of Music and associated residential accommodation for staff and students (use class C2A) • The site has been declared surplus to requirements by the Defence Infrastructure Organisation. • As a vacant Brownfield site it has the potential to contribute towards the strategic housing needs of the Borough and London. • It is acknowledged that conversion or potential redevelopment for residential uses may be needed to support the protection and restoration of the Listed Building. The provision of residential uses (including affordable housing), will need to respect the site's setting within the historic core of Whitton and ensure that any proposal integrates well within the existing surrounding area and existing Whitton community. • It is expected that this site will provide some employment uses (B uses), if feasible including lower cost units suitable for small businesses, the voluntary sector, creative industries and scientific and technical businesses including green technology. Other employment generating uses, such as a hotel, will also be supported. • If there is evidence of need and demand, an element of social infrastructure and community uses, such as leisure, sport and health uses, should be incorporated. • It is expected that the existing playing fields will be retained and where possible upgraded, provided that any existing ecological benefits and the openness and character of the Metropolitan Open Land is retained and, where possible enhanced. • Development will support the restoration and enhancement of the existing Grade II Listed Building (Kneller Hall). The reuse of this historic building offers an excellent opportunity to ensure the site incorporates and promotes a cultural and historic legacy of the 'home of military music'. <p>Any development should respond positively to the setting of</p>	<p>Comments noted. Overall support welcomed. No changes required.</p> <p>The Council considers that the broad approach to SA 14 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. Appropriate uses already include residential, as set out in SA 14. A masterplan/site development brief is to be prepared by the Council in co-operation with the land owner to guide land uses and the appropriate scale, form and design of development.</p> <p>In relation to some of the specific points and changes raised, the following should be noted:</p> <ul style="list-style-type: none"> - As the site is in an area with lack of access to Public Open Space, a key requirement will be the provision of high quality public open spaces and public realm. How this could be provided within the site will need to be considered as part of the Masterplan / site development brief. - It is not considered appropriate to refer to a specific land use class within a site allocation as this will need to be explored and agreed as part of the pre-application and/or planning application process. - It is understood that a formal decision as to the disposal of the site and the relocation of the Royal Military School of Music has yet to be made - this announcement is dependent on an assessment work that is currently taking place and which is proposed to conclude in spring 2018. - Lower cost employment units will be expected in line with other Local Plan policies, and the extent of this provision, including the need, will be explored as part of the Masterplan / site development brief work. - In relation to social infrastructure and community uses, the current policy wording already makes it clear that the need for such facilities should be fully explored. - With respect to the MOL designation, it is not considered appropriate to refer to 'very special circumstances' within the
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8	63	Eleanor Dowsing	SA 16 Cassel Hospital, Ham Common, Ham	Yes	Yes	Yes						I support the proposal to protect the grounds to the rear and side (nearest Langham House Close) this includes the mature trees. As an Other Site of Nature Importance. The ground to the side of Cassel Hospital is habitat to Badgers and Barn Owls and possibly Owls. The trees left following felling need to be protected by Preservation Order. The Architectural Integrity of grade II* listed flats at Langham House Close depend on this boundary to maintain their character.		Comments noted. Support welcomed.
32	260	Margaret Simpson	SA 16 Cassel Hospital site, Ham. Page 12.1.4	Yes	Yes	Yes						This was left blank.	This was left blank.	Support noted.
273	304	Pauline Roberts, Lichfield on behalf of West London Mental Health NHS Trust	SA 16 Cassel Hospital, Ham Common, Ham									<p>Background As explained in previous correspondence, 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 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. This may include the CPSP service relocating off-site in part or in full, the site being rented out either in part or in full and/or the disposal of part or all of the site.</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 Pre-publication consultation on additional sites in July 2014, the New Educational Sites consultation in October 2014 and the Local Plan Review consultation in February 2016. These representations supported the Council's identification that suitable alternative uses for the site would be residential and/or community use and sought the removal of education use from the allocation.</p> <p>Representations were also submitted in August 2016 on the Pre-Publication version consultation which sought the removal of social/community infrastructure as the "most appropriate" use for the site.</p> <p>The Trust continues to be seriously concerned regarding the wording of the allocation in the current Publication Version of the Local Plan for Site Allocation SA16, which states that "social and community infrastructure uses are the most appropriate land uses for this site. Conversion or potential redevelopment for residential uses could be considered if it enables the protection and restoration of the Listed Buildings." We set out below our response.</p>	<p>Proposed Alternative Wording The Trust is agreeable to there being some flexibility in the policy wording to accommodate some social/community uses. Indeed, that could facilitate some use of the building(s) by the Trust should it transition to alternative premises on a phased basis. To support this, the site allocation wording should be amended as follows:</p> <p><i>"If the site is declared surplus to requirements, residential and/or some social and community infrastructure uses are the most appropriate land uses for this site."</i></p> <p>This would be in accordance with the approach adopted in previous consultation versions of the Site Allocations document and Local Plan Review, and would reflect the wording in the Sustainability Appraisal (2017). In addition it would appropriately promote both residential and social/community uses to ensure that a viable and deliverable scheme could be established for the site in accordance with paragraphs 182 and 173 of the NPPF. In association with this revised wording we consider that the supporting text should also be amended as follows:</p> <p><i>"If the site is declared surplus to requirements, in whole or part, appropriate land uses include residential use, and/or some social and community infrastructure uses."</i></p> <p><i>"Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would A residential-led scheme will be expected to provide affordable housing and on-site car parking be considered as a potential redevelopment option subject to robust viability evidence"</i></p> <p>Conclusion In short, the Trust strongly objects to the proposed site allocation for the designation of social/community infrastructure as the most appropriate use for the site. It is considered that the site allocation is unsound because it would be contrary to NPPF paras. 182 and 173. In the event that the site becomes available for development, it would not allow a viable and deliverable scheme to come forward at the site. Given the sensitive context and site specific constraints, residential use will be a</p>	Comments noted. The policy acknowledges that the site is an existing social infrastructure use, and that conversion or potential redevelopment for residential uses could be considered provided that this supports the protection and restoration of the Listed Buildings. It is therefore considered that this policy provides sufficient flexibility. It will be for the applicant/developer to demonstrate that there are no other viable social infrastructure / community uses. This is to ensure compliance with other policies set out within the Plan, such as LP 28 as well as London Plan policies. Reference to viability is also included in the context of allowing for residential development to support the protection and restoration of the Listed Buildings. Also note that Section 13 of the Local Plan deals with viability. Therefore, it is not considered that this policy is contrary to the NPPF as it allows for flexibility and viability to be taken into account provided that certain criteria can be met. No changes required.

Social/Community Use As set out above, the CSPD is a specialist service provided on a national basis rather than a local social/community use. Given the nature of the services neither the building nor the grounds are publicly accessible. Essentially, therefore, the existing site does not offer or support a local community use. The National Planning Policy Framework (NPPF, 2012) requires that Local Plans should be positively prepared, justified, effective and consistent with national planning policy (para. 182). Whilst the Trust supports the possibility of delivering some form of small-scale social/community infrastructure on the site in principle, it cannot support the promotion of this use as “*the most appropriate land use*” as this is not effective or justified in accordance with the NPPF (para. 182). Accordingly, the policy as currently worded is unsound.

This assertion that social and community infrastructure use is ‘*the most appropriate*’ does not appear to be founded on a clear and up to date evidence base and as such, is not positively prepared or justified in the context of the NPPF. The Council’s Infrastructure Delivery Plan supporting the draft Local Plan is dated 2012 and therefore is not up to date as required by NPPF para. 158. Notwithstanding this point, the Delivery Plan identifies a local demand within Ham and Petersham for a primary school, sports hall and fitness centre and a youth centre or expansion of the existing youth centre. The use of the site for education purposes has been explored through previous drafts of the Local Plan and considered inappropriate. Similarly the site is not appropriate for the identified new sports facilities given the site constraints. The provision of a youth centre on the site could be explored as part of a wider development scheme, but would be unviable on its own. On this basis, the Local Plan evidence base does not support the allocation of social and community infrastructure use as the primary and ‘*most appropriate*’ use for the site.

As set out previously, the Sustainability Appraisal (2017) prepared by the Council to support the Local Plan: Publication Version identifies that **some** social/community infrastructure should be provided to mitigate the loss of the social infrastructure. It is considered that the policy wording should be updated to reflect this position and promote **some** social and/or community infrastructure, rather than the primary use for the site. This would also ensure that the policy is in line with the Council’s evidence base (notwithstanding our view that it is out of date) and consistent with the approach set out within the London Plan. On this basis, the allocation would comply with the NPPF para. 182 in terms of being positively prepared and justified.

pre-requisite for a viable development and as such it is considered that the site allocation wording should positively promote residential development primarily with some social/community use as secondary, as per the proposed alternative wording.

Viability 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. This is critically important to the Trust because one of its options might be to develop the site. In the event that this happens, the project must be economically viable and deliverable. If proposals are not viable, the status quo will be maintained and the condition of this Grade II listed building and its grounds could deteriorate through a lack of investment.

In response to our previous comments, the Council has suggested that the policy allows residential development provided it supports the protection and restoration of the listed building and as such provides sufficient flexibility and guidance regarding viability. However, taking into account the extensive nature of the works that need to be undertaken and the quality that will be demanded of those works, due to its status as a listed building and its location within the Ham Common Conservation Area, it is important that the wording of the site allocation is positively prepared to facilitate a viable scheme. Residential development is considered to be a pre-requisite to achieving this given the site constraints, and as such it is considered that this should be reflected in the site allocation wording. The building was originally a residential dwellinghouse and there are numerous examples across London where buildings of a similar age and type have been successfully converted to provide residential apartments, thereby securing a long-term and viable future for the buildings. Furthermore, the reintroduction of residential use at the site would complement the prevailing character of the surrounding area. As such, residential use would be an appropriate alternative use for the site and it is considered that residential development will be necessary as a significant part of any viable redevelopment scheme.

In light of the above, we consider that site allocation wording should explicitly support residential development, rather than presenting it as an alternative use secondary to social/community use. Given that it is considered to be a pre-requisite to fund works to the listed building and secure a long term and viable future for it and its grounds, this approach would ensure that the policy is positively prepared and deliverable in accordance with NPPF para.173.

358	113	Katharine Fletcher, Historic England	SA 16 Cassel Hospital, Ham Common, Ham							<i>See Publication Local Plan Comment IDs 340 and 350.</i>	<p>We recommend that the need for a sensitive approach to the heritage interest of the heritage assets on this site is identified in the policy box. For instance: <i>'...land uses for this site. Any development will need to respect the significance of the heritage assets, ensuring their sensitive repair and re-use. Conversion for residential uses ...'</i></p> <p>A new bullet point is needed highlighting that the site lies within an APA and that policy LP 7 applies. <i>(See Appendix 8 to this document for the schedule of GLAAS comments)</i></p>	<p>Comments noted. It is considered that this is comprehensively covered by the last sentence of the policy and the accompanying reasoned justification under bullet point 7.</p> <p>The Council considers that it is not helpful to state that a particular policy would apply, such as LP7, because the assumption is that all policies within the Local Plan and other related adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan. This is also specifically stated within paragraph 12.1.6 of the Local Plan to avoid the need for cross-references.</p>
175	100	Charles Doe, Ham and Petersham Association	SA 16 and SA 17. Cassel Hospital, Ham Common and St Michael's Convent, Ham Common	Yes	Yes	Yes				<p>On behalf of the Ham and Petersham Association, we are writing our support for the policies outlined in the Site Allocations, SA16 (Cassell Hospital), SA 17 (St Michael's Convent), namely;</p> <p>The designations of both the Other Open Land of Townscape Importance (OOLTI) and Other Site of Nature Importance (OSNI), which must preclude development in these areas in order to retain the character and diversity of the area, with its open spaces, historic gardens and vistas, and to protect wild life and their natural habitat especially along the green corridor from Ham House, to Ham Common and onwards to Richmond Park.</p> <p>Only the minimum number of residential uses to achieve viability should be permitted to retain the historical context of the Listed Buildings in their settings, and to minimise the intervention of the buildings themselves.</p> <p>It is also important that the Listed Buildings and settings should be protected and enhanced during the process of restoration and alterations, to preserve our cultural heritage and historic fabric in the Ham Common Conservation Area. Any development proposals should therefore account for the setting and proximity of neighbouring Listed Buildings.</p>	<p>Comments noted. Support welcomed.</p>	

74	258	Karen Skipper	SA 17 St Michael's Convent, Ham Common, including new OOLTI designation	Yes	Yes	Yes					<p>I feel strongly that the site be designated "Other Open Land of Townscape Importance" because it adds so much to the local quality of life and is the reason many of us, myself included, chose to live here. It should also in my view be designated "Other site of nature importance" because it adds to the natural diversity of the immediate and wider area and maintains bio diversity, open space and aesthetic diversity in this area.</p> <p>Furthermore I would like to see the minimal number of residences allowed to no more than essential to enable the preservation of the grade 2 listed building.</p> <p>The Ham Common Conservation area must be fully respected and enhanced through any development</p>	Comments noted. Support welcomed.
62	270	Patricia Stephens	SA 17 St Michael's Convent, Ham Common, including new OOLTI designation	Yes	Yes	Yes					<p>Any Conservation Area must be enhanced, rather than damaged, by any developments, and the number of residences must be limited to the absolute essential, in order to preserve the Grade II listed building. It is therefore essential to maintain sites of OOLTI and of natural importance, not only to safeguard the Conservation Area, but also to ensure the local quality of life and to maintain natural habitats. Too much damage will be done to the environment if we lose green spaces and trees.</p> <p>Any developments must take into account the impact on the local neighbourhood.</p>	Comments noted. Support welcomed.

72	184	Jane Morrison	SA 17 St Michael's Convent, Ham Common, including new OOLTI designation							<p>Other Open Land of Townscape Importance</p> <p>I 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, i.e.</p> <ul style="list-style-type: none"> • Contribute to the local character and/or street scene, by virtue of its size, position and quality • Value to local people for its presence and openness • Immediate or longer views into and out of the site, including from surrounding properties • Value for biodiversity and nature conservation <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 provided habits for newts, frogs, toads and many other insects and animals. Foxes, badgers and a wide variety birds live within the gardens and the mature trees provide Martingales Close with its unique character.</p> <p>Other Site of Nature Importance</p> <p>Additionally, this natural haven of green space is key to the green corridor that runs between the River at Ham House and Richmond Park; therefore designation of Other Site of Nature Importance is also, in my opinion, deemed appropriate.</p> <p>Building and Development</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, particularly its setting within the established Conservation Area of Ham Common. Any building on the site should ensure that the current state of the listed buildings are improved, not simply maintained. Any potential additional building work within the grounds must be kept to a minimum and clearly should be in keeping with the setting of the original listed buildings and gardens.</p>		Comments noted. Support welcomed.
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75	166	Kathleen Massey	SA 17 St Michael's Convent, Ham Common, including new OOLTI designation	Yes	Yes	Yes				<p>The Local Plan is sound, legally compliant and complies with the duty to co-operate in that:</p> <ul style="list-style-type: none"> -Most importantly, it supports the designation of the gardens of the former St. Michaels Convent, Ham Common as 'OOLTI' - Other Open Land of Townscape Importance' and also 'OSNI' Other site of nature importance, with the conclusion that 'development in this area would not be acceptable'. - It acknowledges that conversion or potential redevelopment for residential uses may be needed for the protection and restoration of the Listed convent buildings, but recognises that 'residential uses should however be limited to the minimum necessary to achieve viability', ie the no. of residences should be no more than essential to preserve the listed buildings, thus ensuring they are enhanced appropriately. -It respects this key triangular Conservation area from Richmond Park to the River Thames, an area that draws visitors from far and wide due to its beauty. If harmed by over-development or indeed inappropriate development, this part of that special triangle will lose its natural beauty and peaceful attraction for wildlife as well as people as a result. - It considers the importance of the 'neighbouring heritage assets' including the historic Ham House Park and Garden and other adjacent Grade II listed properties in the area. - It takes into consideration the emerging Ham and Petersham Neighbourhood plan <p>The above considerations in the Plan, if correctly implemented, will protect this special area, ensuring it retains its unique and historic beauty and will prevent potentially harmful or detrimental effects to the ecology of the area and to the quality of life of the local residents.</p>	Comments noted. Support welcomed.
123	80	Roger Field	SA 17 St Michael's Convent, Ham Common, including new OOLTI designation	Yes	Yes	Yes				<p>I support what is said in SA17 and would strongly object to housing and a car park to be built on the existing garden of the convent (Orford House)</p> <p>As I have said before the gardens have been designated as OOLTI (Other Open Land of Townscape Importance) and this should be respected and no building occur on this land. Also the fact that the gardens are designated OSNI is another reason why there should be no building on this land.</p> <p>The house dated from 1734 is grade 2 listed and should be preserved and surrounded by a garden of appropriate size to match the size of the house which is large.</p> <p>Orford House is also part of the Ham Common Conservation Area and therefore any new building must be minimal in this area.</p>	Comments noted. Support welcomed.

71	85	Fabio Galvano	SA 17 St Michael's Convent, Ham Common, including new OOLTI designation	Yes	Yes	Yes				<p>In view of the OOLTI status designation for the grounds concerned, which has been included by the Council in their draft Local Plan and by the Neighbourhood Forum in its Neighbourhood Plan, I would like to stress that no building should be allowed on OOLTI designated grounds. I understand that not only the Neighbourhood Forum, but also the Ham and Petersham Association, will be objecting for this reason to both planning applications related to this site.</p> <p>I further support the site to be designated OSNI, because of how it adds to the natural diversity of the area and its role in the "green corridor". The grounds involved, which for immemorial years have been characterised by the peace and silence of a convent, will lose any aspect of serenity if the projects are approved. At present the grounds, where the developer intends building a number of different homes irrespective of the compound's nature, contribute to the local character of a protected area by virtue of their size, position and quality, for their openness which is of tangible benefit to local residents as they are part of the network of green spaces and of the green infrastructure that makes the Ham Common area one of the most beautiful sights within the boundary of Richmond-upon-Thames.</p> <p>I am worried by the effects that the development could and would have on the appearance of a Grade II listed building (the convent) that sits within a Conservation Area. The number of residences allowed should be no more than essential to enable the preservation of the Grade II listed buildings. If any, the listed buildings and their setting should be improved, and not damaged, as part of any change to the site. That's why I believe that no building should be allowed over and above the existing footprint of the convent. And certainly no new building should be allowed further along the East boundary that borders Martingales Close, as this would compromise the openness of the site.</p> <p>I would also like to stress that the convent garden is at present a haven of biodiversity, with a richness of trees that is probably unique in the area. I do not believe that this point should be ignored when both planning applications will be discussed. I feel my concern should be everybody's.</p> <p>I hope my objection to both proposals is not in vain and that planning permission of the development, at least in its present form, will be rejected. I thank you for your attention and pledge my trust in your decision.</p>	Comments noted. Support welcomed.
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84	293	Mr & Mrs Neill Tughan	SA 17 St Michael's Convent, Ham Common, including new OOLTI designation	Yes	Yes	Yes					As parents with young children at the end of the close we are extremely concerned that the overall development should be status compliant, sympathetic to the environment and crucially mindful of safety in our immediate proximity, vis-à-vis numerous children that presently choose to play outdoors unencumbered. Quite apart from the preservation of the Grade II listed building with the potential for over expansion, we urge the importance of maintaining quality of life to the convent gardens opposite which were designated "Other Open Land of Townscape Importance". As we see it, this is an ideal opportunity for improvement and enhancement to both the main building and the site as a whole as opposed to the possible overdevelopment and subsequent demise of its present status so fondly enjoyed by its immediate neighbours and their families.	Comments noted. Support welcomed.	
85	167	Paul Massey	SA 17 St Michael's Convent, Ham Common, including new OOLTI designation	Yes	Yes	Yes					The designation of St Michael's Convent as OOLTI and OSNI is very important for the local environment. We live in an area dominated by vehicles, where parking is high level, congestion very difficult and the resulting pollution unhealthy. Ham Common provides a tranquil retreat and further additional building in this area would have a detrimental effect to existing residents as well as substantial harm to wildlife and plants. I therefore support the designations outlined in the Local Plan	Comments noted. Support welcomed.	
87	145	Martin Kirrage	SA 17 St Michael's Convent, Ham Common, including new OOLTI designation								It is essential that the site be designated as "Other Openland Of Townscape Importance". The site and its grounds add a great deal to the character of Ham Common. It should also be designated "Other Site Of Nature Importance". The convent gardens are beautiful and wonderful and any significant building will be to be the detriment of the local environment and wildlife in the gardens.	Consideration should be given to the Ham Common Conservation Area. This Conversation Area must be fully respected and enhanced through any development. In addition the listed buildings should be sympathetically improved as part of any change to the site. I trust the foregoing will be treated with serious consideration for the uniqueness and outstanding beauty of Ham Common and the surrounding area.	Comments noted. Support welcomed.
173	62	Charles Doe	SA 17 St Michael's Convent, Ham Common, including new OOLTI designation	Yes	Yes	Yes					I support the site being designated "Other Open Land of Townscape Importance" essential to retain the character of the area. I support the site being designated "Other site of nature importance" because of how it adds to the natural diversity and its role in the green corridor I support the policy to minimise the number of residences allowed to no more than essential to enable the preservation of the grade 2 listed building The Ham Common Conservation area must be fully respected and enhanced through any development The listed buildings and their setting should be improved as part of any change to the site	Comments noted. Support welcomed.	

151	30	Geoff Bond	SA 17 St Michael's Convent, Ham Common, including new OOLTI designation	Yes	Yes	Yes									The designation of St Michael's Convent as OOLTI and OSNI is appropriate as the site contributes to the area's character and gives significant utility to the neighbouring streets. The site adds appreciably to the nature of Ham providing a range of habitats to plants and wildlife. It also provides an important part of the green corridor from the Thames to Ham Common and Richmond Park. The site description will allow the enhancement of the listed building and its setting though any building should be minimised. The site description and designations will enhance the conservation area that the site sits in.		Comments noted. Support welcomed.
152	16	Andrew Barnard	SA 17 St Michael's Convent, Ham Common, including new OOLTI designation	Yes	Yes	Yes									We fully support the proposals that this site should be designated OOLTI and OSNI. This is consistent with the Strategic Vision in respect of Protecting Local Character. We recognise that, in respect of the developer which has recently purchased the site, there will be commercial considerations to ensure that the redevelopment is viable however these should not be at the expense of encroachment on the gardens or an extension of the footprint of existing buildings. There is potential for the listed buildings on the site to be preserved and enhanced without undue impact on their historic and environmentally important setting		Comments noted. Support welcomed.
359	113	Katharine Fletcher, Historic England	SA 17 St Michael's Convent, Ham Common, including new OOLTI designation												See Publication Local Plan Comment IDs 340 and 350.	A new bullet point is needed highlighting that the site lies within an APA and that policy LP 7 applies. (See Appendix 8 to this document for the schedule of GLAAS comments)	Comments noted. The Council considers that it is not helpful to state that a particular policy would apply, such as LP7, because the assumption is that all policies within the Local Plan and other related adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan. This is also specifically stated within paragraph 12.1.6 of the Local Plan to avoid the need for cross-references.

285	26	Mathew Mainwaring, Indigo Planning on behalf of Beechcroft Developments Ltd	SA 17 St Michael's Convent, Ham Common, including new OOLTI designation See also: Policy: LP 14 Other Open Land of Townscape Importance Paragraph: 5.3.4 Policy: LP 28 Social and Community Infrastructure Paragraph: 8.1.2 [Recorded as Objective ID 286] [ALSO RELEVANT: Proposals Map Changes Local Plan Paragraphs: 2.3 & 2.4]	No			Yes	Yes	Yes	<p>We submit these representations to the London Borough of Richmond upon Thames (LBRuT) Publication Local Plan Consultation on behalf of our client, Beechcroft Developments Ltd. Beechcroft Developments are seeking to develop St Michael's Convent, Ham Common for residential use.</p> <p>St Michael's Convent is currently vacant, having been declared surplus to requirements by the Sisters of the Church and the women of faith who live alongside them. The buildings are no longer suited to the Sisters' needs, particularly given the decline in numbers and costs of maintaining the property and its grounds. As a result, the Sisters have moved to a new facility at Gerrards Cross in Buckinghamshire. With St Michael's Convent becoming surplus to the Sisters' requirements, the site has been purchased by Beechcroft Developments and two planning applications and an application for listed building consent were submitted in September 2016.</p> <p>Several stages of consultation were undertaken by Beechcroft Developments to discuss the proposals with the local community and LBRuT ahead of the application submission and discussions with the Council and local community regarding the applications remain ongoing.</p> <p>We submitted representations to the Pre-Publication Local Plan, which addressed the following policies, site allocation and paragraph numbers:</p> <ul style="list-style-type: none"> • Paragraph 5.3.4; • Paragraph 8.1.2; • Policy LP 14: Other Open Land of Townscape Importance; • Policy LP 28: Social and Community Infrastructure; • Policy LP 37: Housing Needs of Different Groups; and • Site Allocation SA 16: St Michael's Convent, Ham Common. <p>We are pleased that the Council has taken certain aspects of our representations into account, however not all of our previous comments have been taken forward in the Publication version of the Local Plan.</p> <p>These representations are made in relation to the Publication Consultation on the Local Plan.</p> <p>Proposed Site Allocation SA 17: St Michael's Convent St Michael's Convent is currently vacant. It was previously a home to the Sisters of the Church and the women of faith who live alongside them and, as such, it was not open to the public. As noted in our previous representation, while the Sisters occupied the site, they occasionally accommodated a very modest number of visitors who attended as part of their studies to join the clergy. We have been advised that these visitors came from other parts of the UK and internationally, including</p>	<p>Comments noted. The Council treats this site as a social infrastructure use. The policy acknowledges that conversion or potential redevelopment for residential uses could be considered provided that this supports the protection and restoration of the Listed Buildings. It is therefore considered that this policy provides sufficient flexibility. It will be for the applicant/developer to demonstrate that there are no other viable social infrastructure / community uses. This is to ensure compliance with other policies set out within the Plan, such as LP 28 as well as London Plan policies. Reference to viability is also included in the context of allowing for residential development to support the protection and restoration of the Listed Buildings. Also note that Section 13 of the Local Plan deals with viability. Therefore, it is not considered that this policy is contrary to the NPPF as it allows for flexibility and viability to be taken into account provided that certain criteria can be met. No changes required.</p> <p>In relation to the comments provided on housing, needs assessments have been carried out for housing and in relation to other types of developments and uses, such as in relation to employment, retail, open spaces and playing fields/sports pitches. Housing has been discussed with other authorities through the Duty to Cooperate. Relevant housing targets for the borough are derived from the London Plan, which takes account of limited land supply, and as such the current dwellings per annum target is 315. The Borough's 2015/16 Housing AMR indicates that there are sufficient identified sites in place to exceed the borough's housing targets within the Plan period, also taking into account the 5% buffer. Whilst the Local Plan does not meet the objectively assessed housing need, local evidence and justification elaborates upon the reasons as to why this need cannot be met. Therefore, there is no conflict with the NPPF as paragraph 14</p>
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Africa. In this sense the site did not play any real role in supporting an extensive or substantive local community use. When the Sisters' occupied the site, there was no public access to St Michael's Convent, except with their permission, which was only offered perhaps a couple of times a year, for example open garden days as part of the National Garden Scheme. However, this is very far removed from any reasonable definition of community use.

Draft Policy SA 17 states that social and community infrastructure uses are the most appropriate land use for the site and, in response to our representations to the Pre-Publication Local Plan, the Council reiterated that it treats the site as social infrastructure use. The Council has not undertaken any assessment or provided any evidence to support such a conclusion.

Conversely, the Council and the GLA has a very strong evidence base which demonstrates a strong need for residential accommodation. In fact, the housing target for Richmond has further increased from 895-915 dwellings per annum in the London Borough of Richmond upon Thames Draft SHMA (June 2016), to 1,047 dwellings per annum in the London Borough of Richmond upon Thames SHMA (December 2016). Furthermore, residential is the only serious land use that can support the long term viability of looking after the listed buildings and adjoining land. The contention that social and community infrastructure uses are the most appropriate land uses for the site is therefore neither justified nor effective.

The subtext of Site Allocation SA 17 identifies that the gardens of St Michael's Convent are designated as Other Open Land of Townscape Importance (OOLTI) and Other Site for Nature Importance (OSNI).

In response to our representations to the Pre-Publication Local Plan regarding Policy LP 14 and the proposed designation of St Michael's Convent gardens as OOLTI, the Council indicated that it can consider open land designations as part of the Local Plan Review. However, as stated in our previous representations, there is a lack of evidence to support the designation of St Michael's Convent gardens as OOLTI and we have fundamental concerns regarding the introduction of this designation without the appropriate evidence.

The draft Site Allocations DPD (2014), which has since been incorporated into the new Local Plan Review, sought to introduce the gardens to the OOLTI designation.

In 2006 Allen Pyke & Associates, on behalf of the Council, carried out a review of open land designations in the Borough to assess whether they were appropriately designated. They then reviewed a further 100 other open areas. The consultants suggested that 35 areas be

makes clear that needs should not be met if: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.

In relation to the OOLTI designation, the Council considers that the gardens of St Michael's Convent meet the criteria for OOLTI designation; taking each criterion in turn:

- Contribution to the local character and/or street scene, by virtue of its size, position and quality – The area covered by these gardens is of significant size and not only contributes to, but largely defines the local character of this part of Ham Common. The site is valued by local people as evidenced by its recommendation for OOLTI protection by local Councillors and a large number of local residents. In addition, the designation of the gardens as OOLTI will also contribute to preserving and/or enhancing the setting of the Listed Building.
- Value to local people for its presence and openness – The substantial local support received throughout the development of this Plan for the designation of this site as OOLTI demonstrates that the gardens are of value to local people for its presence and openness. It should be noted that the Council has first published its intention to designate the gardens as OOLTI in August 2014, and strong local community support has been received ever since then.
- Immediate or longer views into and out of the site, including from surrounding properties – this is particularly relevant for the residents of Martingales Close, because its houses are on one side of the road only, the other side adjoining the Convent garden.
- Contribution to a network of green spaces and green infrastructure as set

designated as OOLTI, and a further 65 should be put forward for consideration. St Michael's Convent was not identified in this comprehensive study which forms the basis of formal designations through the 2011 Development Management Development Plan Document. This is clear evidence that the site is not of sufficient value in planning terms to be designated OOLTI.

Given the comprehensive nature of the work on the review, it was the DM DPD which should have introduced the OOLTI designation if this was justified. The Site Allocations DPD was not the appropriate document to amend the provisions of the DM DPD or the Local Plan proposals map.

Supporting paragraph 5.3.4 of the Publication Local Plan states that OOLTI should be predominantly open or natural in character with associated criteria. The council has not undertaken any proper assessment of the site in the context of this description.

The proposed OOLTI designation covers the majority of the garden area to the rear of the convent. This area is part of the domestic amenities of the main building. It is very well screened on its boundary, to the point where it is very difficult to get any views into the site. This is not surprising given the domestic nature of the area. The boundary planting provides some general amenity and it is protected by virtue of its location within a conservation area. In this way, the value of the site to its surrounding will be maintained into the future. The site is relatively small and is not visible in general views from Ham Common and it fronts onto a cul-de-sac comprising 19 dwellings, built in the late 1960s on land similar to the proposed OOLTI land, once owned by the convent and the adjoining neighbour.

The proposed OOLTI land does not therefore meet the criteria of the OOLTI designation due to its lack of contribution to local character.

Furthermore, paragraph 5.3.4 of the Publication Local Plan states the following prior to the OOLTI assessment criteria: "note that the criteria are qualitative and not all need to be met". This text undermines the value of the OOLTI policy, making it open-ended and preventing it from being rigorously applied in practice. The designation of the gardens as OOLTI is therefore not justified, nor consistent with the NPPF (paragraph 158), as it lacks the necessary evidence base.

The subtext to SA 16 (the former site allocation reference for St Michael's Convent) in the Pre-Publication Local Plan stated that the Council recognised the biodiversity value of the St Michael's Convent gardens and would investigate the potential to designate the site as OSNI. The OSNI designation has since been confirmed in the subtext to SA

out in policy LP12 in 5.1 'Green Infrastructure' – The garden lies in the Great South Avenue of Ham House, at the heart of the wildlife corridor. The gardens provide an important link as part of the green corridor in Ham, which runs between Richmond Park to the River Thames via Ham Common, St Michael's Convent and Avenue Lodge gardens, Grey Court School playing fields, Ham House avenues and gardens, and the Ham Lands.

- Value for biodiversity and nature conservation – The Council proposes to designate the gardens as Other Site of Nature Importance (OSNI) as part of the Local Plan due to its great environmental importance and biodiversity value (*see further comments on this below*)

- For the reasons set out above, the Council considers that this site meets all the criteria for OOLTI and can be soundly designated as such. The Council does not consider that the criteria for OOLTI designation are 'open-ended' as suggested by the respondent as these have been duly considered and agreed by the Inspector who conducted the Development Management Plan examination in 2011.

With respect to the proposed OSNI, the Council relies on the robust evidence provided by Salix Ecology, who undertook the habitat surveys at a number of sites across the borough. The ecology consultants considered that this site is an important part of the River Thames to Richmond Park Green Corridor. It contains a wide variety of native and non-native tree species - most notable a 300 year old black mulberry. 45 species of birds have been recorded including a number of Red 2 List species. Bats also commute across the area including Daubenton's bat. It is therefore considered that the OSNI designation is sound and based on robust evidence.

										<p>17 in the Publication Local Plan.</p> <p>The designation of St Michael’s Convent gardens as OSNI is based on evidence gathered in a habitat survey undertaken by Salix Ecology, dated September 2016: ‘Habitat survey of proposed Sites of Importance for Nature Conservation in the London Borough of Richmond upon Thames’ (hereafter referred to as the Survey).</p> <p>The Survey investigates five sites, including St Michael’s Convent, and seeks to establish those which may qualify for designation as Sites of Importance for Nature Conservation. The Survey involved a two-part assessment: a desktop study involving the retrieval of species records and site related information from organisations; and a habitat survey of each site (access permitting).</p> <p>The two-part assessment was used to review all sites other than St Michael’s Convent, to which there was no access. This is evidently a limitation to the applied methodology and is identified as such within the ‘Methods’ section of the Survey, at paragraph 2.4.5: “There was no access to St Michael’s Convent. As a consequence the site’s ecological value was assessed via a data search. Although the documents reviewed were likely to be accurate this could not be guaranteed”.</p> <p>In the Survey’s recommendations relating to St Michael’s Convent (section 5.3), it states: “It is strongly suggested that the site is surveyed and its quality confirmed. Subject to this confirmation it is recommended that this potentially important site to be designated as Borough Grade 2 SINC”. We therefore have fundamental concerns with the designation of the gardens as OSNI, as the designation is clearly at odds with the recommendation of the evidence on which it is based. The designation is consequently not justified, nor consistent with the NPPF (paragraph 158), as it lacks the appropriate evidence base.</p>		
360	113	Katharine Fletcher , Historic England	SA 18 Ryde House, East Twickenham							<p>See Publication Local Plan Comment IDs 340 and 350.</p>	<p>A new bullet point is needed highlighting that the site lies within an APA and that policy LP 7 applies. (See Appendix 8 to this document for the schedule of GLAAS comments)</p>	<p>Comments noted. The Council considers that it is not helpful to state that a particular policy would apply, such as LP7, because the assumption is that all policies within the Local Plan and other related adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan. This is also specifically stated within paragraph 12.1.6 of the Local Plan to avoid the need for cross-references.</p>

169	299	Paul Velluet	SA 19 Richmond Station, Richmond							<p>This representation follows my formal response to consultation on <i>The First Draft of the London Borough of Richmond-upon-Thames Local Plan (Pre-publication version)</i> in relation to Site-specific proposal SA 19 – Richmond Station, Richmond, submitted in August, 2016. A summary of my response is set out in the Council’s <i>Summaries of responses received in relation to the Local Plan policies and site allocations and Council’s response</i>, reference 437.</p> <p>This representations takes account of the formal advice on ‘soundness’ as explained in paragraph 182 of the <i>National Planning Policy Framework</i>.</p> <p>In my response to consultation on the <i>Draft Local Plan</i> last August, I stated:</p> <p>‘The original frontage building of the Station facing Kew Road containing the generously proportioned upper concourse together with the circulation areas, platform-buildings and platform-canopies comprise a well-designed and coherent complex of sufficient special architectural and historic interest to merit statutory listing. Completed in 1937 the station complex was designed for the Southern Railway by the company’s Architects Department under the direction of James Robb Scott (1882-1965) and connects sensitively to the surviving and very fine, 19th century platform-canopies serving island-platforms 4 and 5 and 6 and 7. The same architectural team designed the almost contemporary, grade II* listed Surbiton Station.</p> <p>Having used the Station almost continuously since the early-1960s, together with many other Borough residents and visitors to Richmond, I value the distinctive architectural character and significance of the complex, its efficient layout, and above all, the platforms being day-lit and open to the sky and naturally ventilated. Any development taken across and above some or all of the existing tracks and platforms would not only seriously damage the architectural integrity of the existing station complex but would destroy the amenity presently enjoyed by the travelling public. <u>Accordingly, the proposal as presently envisaged under SA 18 is not only totally unacceptable, but runs against the relevant policies contained in the <i>National Planning Policy Framework</i> and the Council’s existing and emerging conservation and other policies’.</u></p> <p>I should add the Station was rightly recommended for statutory listing by The Richmond Society in May, 1976 and again in December, 1988 and April, 1989. I am not aware that the case for listing has been addressed by English Heritage or Historic England since then. In July, 1997, English Heritage wrote to the architects for a potential redevelopment scheme for the entire station</p>		<p>Comments noted. No changes required. Policy SA 19 recognises that the station is a designated Building of Townscape Merit (BTM). The adopted site brief for Richmond Station acknowledges the constraints provided by the BTM designation; however, it states that visual character lies principally in the façade and booking hall, with the side and rear of the buildings being unattractive and not contributing to the setting.</p> <p>The Council needs to achieve a balance between making the best use of land, particularly in locations such as key transport interchanges (where there is a growing emphasis on maximising densities) against the site’s location within a Conservation Area, and the building’s status as a Building of Townscape Merit, which is a non-designated heritage asset. In line with the NPPF (para 135), the effect of an application on the significance of a non-designated heritage asset will be taken into account in determining an application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Therefore, the policy is considered to be consistent with the NPPF. It should be noted that the wording in relation to the heritage aspects and Conservation Area has been agreed with Historic England.</p> <p>In relation to this site being a key development site, the Richmond Retail Study provides evidence of need for additional retail floorspace over the plan period, and Richmond station will be key in delivering additional retail provision in Richmond centre. In relation to B1 office floorspace, as a result of the Permitted Development Rights introduced in 2013, a significant amount of B1 floorspace has been lost in the borough and particularly within Richmond centre. Therefore, this site provides a key opportunity to re-</p>
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complex and adjoining sites in further to a 'Planning Weekend' public consultation exercise recalling that two of the key principles which enjoyed overall support from those attending were the retention of the existing station frontage building and its effective integration into new development; and the maintenance of full daylighting down to platform-level across all platforms, possibly within a fully glazed enclosure.

In my response to consultation on the *Draft Local Plan* last August, I suggested that the project needed to be fundamentally reviewed and redrafted to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms. I note that in a submission to the Council by The Twentieth Century Society, it expressed great concern that the *Draft Local Plan* promoted the Station site for 'comprehensive redevelopment', stating that 'given the architectural and historic importance of the building, as well as its clear townscape value within a conservation area... the draft as it stands runs counter to the guidance of the *NPPF* and to the guidance set out in the *Central Richmond Conservation Area Statement*, which specifically identifies development pressure as a problem, and which promotes the preservation, enhancement and reinstatement of architectural quality', and urged at site-specific proposal SA 18 should be redrafted 'in a way which encourages only conservation-led development which explicitly safeguards the retention and restoration of the 1937 station building'. Whilst the addition of references to the location of the Station within a conservation area and to its designation as a *Building of Townscape Merit* is to be welcomed, no justification whatsoever is provided for the Council's assertion that 'the Station is a key development site' and that 'there is a need for comprehensive redevelopment' in order to deliver transport interchange improvement. The Council has not provided any assessment of the potential impact on the retail and business health of the remainder of the Town, on the amenity of its residents and visitors, and on the viability of existing cinemas in the Town that would result from providing 'approximately 10 000 square metres of retail floor-space', 'substantial provision of employment floor-space, particularly B1 offices', 'other uses, such as for community, leisure and entertainment' and 'housing in (sic) upper floors'. Similarly, the Council has not provided any assessment of the potentially damaging impact on the character and appearance of the conservation area and on traffic movement and car-parking in the Town that would result from the essential

provide some of the lost B1 floorspace in the centre. Potential impacts on the Conservation Area and setting of the wider area, as well as transport, access and servicing arrangements, will need to be considered as part of the development management process, whereby all policies in the development plan will be applied.

servicing requirements of such a vast multi-use development. Such omissions render the proposal as presently worded entirely unsound and unsustainable. The statement that 'any redevelopment (sic) proposal must be of the highest quality in character and respond positively to the Conservation Area' is entirely inadequate in setting the necessary parameters for development of the site' given the failure to refer to the need to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms, and the need to ensure that any new development should either preserve or enhance the character and appearance of the conservation area and sustain its significance.

Finally and importantly, as presently drafted, there is a failure to distinguish between the purpose-built railway station, which is clearly of particular architectural, historic and townscape significance, and the later, post-War commercial buildings fronting The Quadrant and the Kew Road to each side of the main Station frontage and the multi-storey car-park on the southern side of the station complex which possess no such significance.

In the interests of clarity and consistency with the conservation and other relevant policies in the *National Planning Policy Framework*, the *London Plan*, and the emerging *Local Plan* and the need for a sound and sustainable statement of planning and conservation policy, the existing the site-specific proposal needs to be fundamentally reviewed and redrafted.

246	58	Matt Richards , Bidwells on behalf of Curzon St Ltd	SA 19 Richmond Station, Richmond	Yes	No	Yes			Yes	Yes	<p>We write on behalf of the owners of The Quadrant, Richmond to make representations in respect of the public consultation regarding the Richmond Local Plan Review, including proposed changes to the Proposals Map. The Quadrant office building, the NCP car park and the retail parade occupies an important location in Richmond Town Centre, adjacent to the railway station. The site forms part of a wider allocation at the Richmond Station that proposes a comprehensive redevelopment of the area to improve the transport interchange and increase retail and employment floorspace. This letter sets out our representations in relation to employment and town centre draft policies; parking draft policies; and the proposed allocation for the station site. We are of the view that some further consideration needs to be given to a selection of policies to positively plan for the site's future in a sustainable manner. See Appendix 3 to this document for site location plan, with client's site edged in red.</p>	<p>Site Allocation SA19 Richmond Station, Richmond</p> <p>The draft allocation's aspiration to provide retail and employment floorspace and improved transport connections is supported in principle. Notwithstanding the support, the allocation boundary includes a number of sites in multiple ownership. This allocation has been in place for some time, and we are not aware of Network Rail, the key land owner in this allocation, as having any plans to bring forward development of their land.</p> <p>It is therefore considered important that flexibility be incorporated into the allocations wording so that parts of the wider site can be brought forward separately.</p> <p>The redevelopment of, for instance, the Quadrant and retail parade adjacent to the Station, will help to create a vibrant station approach, improving the vitality and viability of the station area encouraging investment to the town.</p> <p>The supporting text to the proposed allocation notes the site is located in the borough's largest centre and therefore there is an expectation that any proposals makes a substantial provision of employment floorspace, particularly B1 offices. This is supported, however as noted above flexibility is sought in respect of the provision of affordable workspace when dealing with extensions to existing buildings that have incumbent tenant arrangements and floorplate restrictions. In summary, the draft policy provisions to encourage economic development within Richmond town centre and this site are supported in principle, however some detailed changes are sought to enable the effective delivery of such development moving forward.</p> <p>These changes are considered necessary to make the Local Plan consistent with national policy and effective and thereby meet the tests of soundness set out in paragraph 182 of the NPPF.</p>	<p>Comments noted. No changes required to Policy SA 19.</p> <p>See Officer response to Comment ID 244 above in relation to policy LP 41 and affordable workspace.</p>
361	113	Katharine Fletcher , Historic England	SA 19 Richmond Station, Richmond								<p>See Publication Local Plan Comment IDs 340 and 350.</p>	<p>A new bullet point is needed highlighting that the site lies within an APA and that policy LP 7 applies. (See Appendix 8 to this document for the schedule of GLAAS comments)</p>	<p>Comments noted. The Council considers that it is not helpful to state that a particular policy would apply, such as LP7, because the assumption is that all policies within the Local Plan and other related adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan. This is also specifically stated within paragraph 12.1.6 of the Local Plan to avoid the need for cross-references.</p>

167	31	Svetlana Braddell	SA 20 Friars Lane Car Park, Richmond							Whilst I do not object to the car park being redeveloped, I do wish to shed light on the fact that a 4 storey redevelopment would not be in keeping with Queensbury House or any of the surrounding properties in Friars Lane. I have been a Richmond resident for 24 years and firmly object to a 4 storey redevelopment.	Comments noted. No changes required. It should be noted that the Local Plan does not propose a 4-storey development on this site. The scale, density and massing of any development coming forward on this site and the potential impacts, including on character and amenity, will be assessed as part of consideration of a planning application. The Council will consider any proposal against all the relevant Local Plan and London Plan policies as well as the National Planning Policy Framework and national guidance. It should also be noted that other policies within the Plan will also need to be complied with, including for example Policy LP 8 Amenity and Living Conditions.
150	103	Lea Hanrahan	SA 20 Friars Lane Car Park, Richmond							As a resident of this quiet and historic area, I very much object to the possibility of a 4 story development on the site. As you no doubt know there is an error in the planning documents which supports this plan...where it refers to Queensberry House as 4 story development which it is not. It is a 3 story building and anything bigger than that would blight the road, the buildings immediately adjoining it, those facing it and the neighbourhood in general. More generally the development of the car park will not only change the character of the neighbourhood by increasing the density and urban quality of the area, it will impact residents' parking situation , which if you know the issues we residents have, is already at breaking point. Builders, tradesmen and visitors take up substantial proportions of the 'residents only' parking on the Green and immediate surrounds, using visitor daily parking permits. In addition those of us who live near the Green see daily how 'resident' parking bays are filled up early every morning by other people who drive to the Green...and who therefore must obviously live elsewhere. If your plan is truly to deplete the parking availability around the Green, some consideration ought to be given to limiting the use of the very scant residents parking in the immediate area of the Green, ideally limiting it to those who actually live around the Green and between the High Street and the River.	Comments noted. No changes required. It should be noted that the Local Plan does not propose a 4-storey development on this site. The scale, density and massing of any development coming forward on this site and the potential impacts, including on character, transport, parking and amenity, will be assessed as part of consideration of a planning application. The Council will consider any proposal against all the relevant Local Plan and London Plan policies as well as the National Planning Policy Framework and national guidance. It should also be noted that other policies within the Plan will also need to be complied with, including for example Policy LP 8 Amenity and Living Conditions and policies LP 44 and LP 45 on Transport and Parking.

181	46	Barbara & Kenneth Childs	SA 20 Friars Lane Car Park, Richmond							<p>We object to any high density development for Friars Lane car park. Only a development that is in strict keeping to the historical area and lane. We propose two storey townhouses similar to Queensberry Place , set back from the street with gardens in the back.</p>		<p>Comments noted. No changes required. The scale, density and massing of any development coming forward on this site and the potential impacts, including on character and amenity, will be assessed as part of consideration of a planning application. The Council will consider any proposal against all the relevant Local Plan and London Plan policies as well as the National Planning Policy Framework and national guidance. It should also be noted that other policies within the Plan will also need to be complied with, including for example Policy LP 8 Amenity and Living Conditions.</p>
362	113	Katharine Fletcher , Historic England	SA 20 Friars Lane Car Park, Richmond							<p><i>See Publication Local Plan Comment IDs 340 and 350.</i></p>	<p>A new bullet point is needed highlighting that the site lies within an APA and that policy LP 7 applies. <i>(See Appendix 8 to this document for the schedule of GLAAS comments)</i></p>	<p>Comments noted. The Council considers that it is not helpful to state that a particular policy would apply, such as LP7, because the assumption is that all policies within the Local Plan and other related adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan. This is also specifically stated within paragraph 12.1.6 of the Local Plan to avoid the need for cross-references.</p>

189	288	Sarah Hoad, Transport for London	SA 21 Sainsbury's, Lower Richmond Road, Richmond							<p>This letter follows receipt of the notification that the London Borough of Richmond has undertaken consultation on the publication version of the proposed Local Plan. The following provides relevant updates and commentary on the proposed wording where appropriate, which follows previous consultation in January 2016 and July 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.</i></p> <p>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. The GLA letter makes reference to the need to have regard to TfL's specific comments in respect of transport and infrastructure.</p> <p>SA21, Sainsbury's, Lower Richmond Road, Richmond Details of the level of development considered at this site should be provided to TfL given the proximity and impact to Manor Circus, where a significant junction improvement project is being developed.</p>	Comments noted. No changes required.
17	221	Philippa Edmunds, Pools on the Park User Group	SA 22 Pools on the Park and surroundings, Old Deer Park, Richmond P182/3		Yes					<p>In summary We suggest that the following wording is ambiguous and therefore needs to be qualified and properly defined. <i>The Indoor Sports Facility Needs Assessment suggests that ideally the building should be rebuilt to offer residents a modern swimming experience.</i> If offering a modern swimming experience means upgrading the changing rooms we support that and the clause should clearly state that in the Local Plan but if it means changing the style of the main pool hall including glazing, layout and lengths and depths of the indoor, outdoor swimming pools and the landscaped area then we object. Our main point is the actual swimming experience is good with two main pools and the learner pool so the above wording from the Plan in italics is misleading. We believe that the Local Plan should therefore state that the main pool hall, the outdoor pool and landscaped area should be retained because Richmond Pools offer a unique swimming experience for the following reasons:-</p> <ul style="list-style-type: none"> • 33 metre indoor pool which is surrounded by glazed walls which mean that it is very light hugely enhancing the swimming experience. Additionally the depth of the pool is 	Comments noted. The Indoor Sports Facility Needs Assessment was carried out by specialist sport consultants (Knight Kavanagh and Page), and their findings concluded that ideally the building should be replaced / rebuilt to offer residents a modern swimming experience. This point has therefore been reflected within the Local Plan policy. This is a reflection of the concerns in relation to the aging stock that will be expensive to maintain. In line with the policy and other policies of the Plan, i.e. LP 3, the significance of the heritage asset (i.e. the listed status of the Pools complex) will need to be understood to inform any future scheme for this site. No changes required.

very attractive and quite unusual now as with the outdoor pool too.

- 33 metre outdoor pool set in landscaped grounds with deep water
- Good sized indoor learner pool
- Paddling pool outside

As the Local Plan says the changing rooms need updating, refurbishing as there is poor insulation there which makes them very cold in the winter and hot in the summer but the actual swimming pools are special and unusual and should therefore not be changed.

We want to protect and preserve the areas of the site which have architectural merit such as the indoor pool hall and outdoor pool, confines and landscaped area which should retain listing buildings status. However, we do not believe that the other areas of the building such as the area housing the changing rooms, studios, gym need to be protected. These parts of the building should be re-designed, modernised and improved to make the facility more modern, more sustainable and more financially viable longer term.

Protect the following parts of the existing building and landscaped area

- indoor pool hall and glazing
- outdoor pool
- landscaped grass all around the pool including the grass area behind the deep end of the in-door pool
- the internal and external balcony over both main pools
- The learner pool
- Paddling pool which could be enhanced.
- The glazed area at the top of the spectator seating

All these aspects of site have huge architectural merit as demonstrated in the listed building status and must be preserved as part of the unique design which must be protected.

We would also like to make the following points:-

1. Pool hall ceiling and roof needs refurbishing.
2. We support the introduction of an outdoor removable cover for outdoor pool
3. Retain and improve the wall around the grass area which acts as crucial separation between road for noise, pollution and security and seclusion reasons as well as stopping people entering the area illegally.

Philippa Edmunds, Louise Lubienski and Alison Gabrielides – Pools on the Park User Group.

363	113	Katharine Fletcher, Historic England	SA 22 Pools on the Park and surroundings, Old Deer Park, Richmond								<i>See Publication Local Plan Comment IDs 340 and 350.</i>	<p>We recommend that the policy box refers to the listed status of the existing swimming pool building. This should refer to the need for full justification being required for any development proposals based on an assessment of the significance of the building.</p> <p>A new bullet point is needed highlighting that the site lies within an APA and that policy LP 7 applies. <i>(See Appendix 8 to this document for the schedule of GLAAS comments)</i></p>	<p>Comments noted. It is considered that bullet points 3 and 4 of the reasoned justification to the policy provide comprehensive coverage for the listed status.</p> <p>In addition, the Council considers that it is not helpful to state that a particular policy would apply, such as LP7, because the assumption is that all policies within the Local Plan and other related adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan. This is also specifically stated within paragraph 12.1.6 of the Local Plan to avoid the need for cross-references.</p>
302	202	Peter Willan, Old Deer Park Working Group	SA 22 Pools on the Park and surroundings, Old Deer Park, Richmond SA 23 Richmond Athletic Association Ground, Old Deer Park, Richmond THE WORDING OF SITE-SPECIFIC PROPOSALS SA 22 AND SA 23 (REFERENCES 448 AND 451)	No							<p>The Group welcomes the amendment to the title of Site-specific Proposal SA 22 and the inclusion of references to 'the need to understand the significance of the listed pools complex' under Proposal SA 22, and to the Royal Botanic Gardens, Kew World Heritage Site buffer-zone under both Proposals under SA 22 and SA 23.</p>	<p>However the Group notes with considerable regret the continuing resistance of the Council to amend the wording under both Site-specific Proposals SA 22 and SA 23 as urged by the Group in its formal submission of August, 2016, in particular, the need for any proposed improvements or additional development 'to respect the parkland character of the Metropolitan Open Land, avoiding encroachment into the boundary of the (respective) sites'.</p>	<p>Comments noted. No changes required. See Officer response to Comment ID 297 above.</p> <p>In addition, it should be noted that more detailed guidance against which future development proposals within the Old Deer Park will be considered is currently being drafted through the development of a Supplementary Planning Document for the area. An informal consultation was undertaken in October – November 2016 to help inform the development of that document, which will be the subject of further consultation in 2017.</p>
39	212	James Patterson	SA 23 Richmond Athletic Association Ground, Old Deer Park, Richmond. Page 183. Paragraph 12.	No			Yes	Yes			<p>As I have already said in my comments submitted during the recent public consultation on the "Supplementary Planning Document (SPD) for the Old Deer Park", it is my opinion that the principles and strategies that form the basis of the present proposals as far as the RAG is concerned are too limited in scope and are not directed towards ensuring that in future the RAG is best used for the community as a whole.</p>	<p>Some of the main reasons I have reached the conclusion set out above are as follows: Overall Utilisation of the RAG In 2012, the Old Deer Park Working Party issued a report entitled "Old Deer Park, Richmond: A Framework for Future Conservation & Enhancement" which was based upon an earlier consultants' report. In its Report, the ODPWG noted that the lease of the RAG was due to expire in April last year and commented that such a renewal provided an opportunity for advancing more successfully the policies etc. set out in the Landscape Strategy. This seems eminently sensible to me. In my view, such a review is necessary as a prelude to producing an SPD for the RAG and if not already carried out should be put in hand as soon as practicable. I feel such a review should:</p> <ul style="list-style-type: none"> • Examine the changes that have taken place in utilisation of the RAG over the years. In the 1860s, when a lease was first 	<p>Comments noted.</p> <p>The aim of policy SA 23 is to support the continued use of this site for sports uses, and this will include upgrading and improvements to existing facilities, as outlined as a need within the Borough's Playing Pitch Strategy and Assessment report.</p> <p>The Council is currently preparing a Supplementary Planning Document for the Old Deer Park, which is being undertaken within the context of the Council's planning policies. It is anticipated that consultation on the final draft SPD is undertaken later in 2017. No changes required.</p>

granted for the Athletic Ground, some eight amateur sports used the Ground - today there is just one amateur club.

- Set out the principles that should be applied in future for the RAG which I suggest should include that:

- Priority should be given to amateur and junior sports

- Minimal if any professional sports should be played at the RAG

- Any developments of the RAG should be to meet current needs and not some future aspirations. . This will help avoid past mistakes being repeating.

- Commercial activities at the RAG particularly commercial car parking (see below) should be eliminated or strictly limited.

- Look at alternative structures for best managing the RAG such as combining the RAG with the London Welsh ground or reuniting the RAG under the Council so that it may be better coordinated with use of the other parts of the ODP managed by the Council.

The rugby clubs that use the RAG at present have stated they intend to submit plans for development of the Ground. It seems important to me that before such plans are submitted or considered certain parameters such as those outlined should be set out in advance.

Use of the RAG for Sports

The Council's Playing Pitch Strategy on which the Site Allocation plan for the RAG is based, suggests that the sports pitches at the RAG need to be enhanced due to them not meeting current demand. As someone who overlooks the RAG practically every day my impression is that this does not represent the reality. My impression is that over some time, use of the pitches has declined dramatically and presently they are grossly underused, in fact I would say they are used less than 5% of the available time. It also seems to me that numbers of supporters attending games have also declined considerably.

This usage of the sports facilities is in marked contrast with the RAG car park which is used nearly 100% of the time with up to 300 vehicles on an average weekday and much overnight parking and including commercial vehicles. It is not clear to me why the Council permitted the commercial car parking at the RAG and I have been unable to find how or when it was approved or what constraints were placed upon it.

In conclusion, I feel that the principles and strategy set out in SA23 will not result in a plan for the future use of the RAG that will be the most beneficial for our community and some of the base assumptions are questionable - more work needs to be done and a wider perspective should be taken than has been to date.

207	239	Dean Jordan, DP9 on behalf of Richmond Athletic Association	SA 23 Richmond Athletic Association Ground, Old Deer Park, Richmond							<p>On behalf of our client, Richmond Athletic Association, we are writing to submit representations regarding the Council's consultation on the draft Local Plan.</p> <p>Richmond Athletic Association ('RAA') was incorporated in 1886 and is responsible for managing the Richmond Athletic Ground which is located within the Old Deer Park and has been used for organised sporting activities since that time. The ground is home to two of the most recognised rugby clubs in the country (Richmond & London Scottish) and is used by hundreds of men, women, youth and mini rugby players for matches and training purposes throughout the season.</p> <p>Aside from the 4,000+ members within the two rugby clubs who enjoy the facilities on a regular basis, the RAA hosts a number of rugby 7s tournaments such as the Lloyds Insurance 7s, Surveyors 7s, City 7s, Law Society 7s, NAB 7s and Middlesex Club 7s, as well as established community events such as the Rugby Rocks Festival. The RAA has strong connections within the local business community and also provides facilities for the local Falcons Boys School.</p> <p>Several years ago the RAA started to investigate how they can improve the existing facilities at the ground in order to meet increasing demand from the local community and secure the future of rugby on the site. The RAA have been in discussions with the London Borough of Richmond Upon Thames in recent years and have met with the local community groups on six separate occasions since March 2013 to discuss potential redevelopment proposals for improved facilities on the site. The feedback from these meetings has been positive and has led to the RAA preparing a draft masterplan for the site and to investigate the costs associated in delivering these works. The preparation of the draft Local Plan provides a positive opportunity to discuss and align the aspirations of the RAA, the Council and the local community to improve the facilities as well as public access.</p> <p>The opportunity is welcomed at this stage to respond to this consultation which is seen as one step in the process of ongoing dialogue with the Council and the local community. We set out below the initial observations on its content.</p> <p>Draft Local Plan Representations</p> <p>Our client is generally supportive of the positive approach taken by the draft Local Plan in regards of the direction of</p>	<p>Site Allocation SA 23 - Richmond Athletic Ground, Old Deer Park, Richmond</p> <p>Our client strongly supports the inclusion of the Richmond Athletic Association Ground within the site allocations of the draft Local Plan. The document acknowledges that the sports ground needs to be retained, however, improvements are required in relation to the existing facilities as a result of their age and current usage. The draft Local Plan also notes that the provision of new facilities on the site may require additional complementary development. Our client supports the inclusion of this text within the document as it is fundamental to enable the improvement/replacement of the existing facilities which would otherwise be financially unattainable. Complementary development will be required to fund the improvement of the ground and facilities necessary to achieve the quality of provision required to meet the needs of the club and local community.</p> <p>The draft Local Plan acknowledges that additional development to support the improvements to the grounds will be for associated leisure and other complementary uses and provide for a comprehensive development approach for the whole site. For clarity, we request that the draft Local Plan specifically acknowledges residential as a complementary use as it is the most viable and sympathetic option to obtain the funds necessary to facilitate the improvements.</p> <p>For consistency within the document we request that the third bullet point on page 184 be amended to read <i>"The whole site is designated as MOL and therefore inappropriate development would not normally be acceptable, however the Council acknowledges that complimentary development may be necessary to support the costs of improving / replacing existing facilities. As the pavilion is listed as Grade II and the site lies within a Grade I Historic Park and Garden and Conservation Area as well as within the Royal Botanic Gardens, Kew World Heritage Site buffer zone, any proposals will be considered within the context of these designations."</i></p> <p>The Council's Playing Pitch Strategy was prepared by Knight Kavanaugh and Page ('KKP') for the London Borough of Richmond Upon Thames in August 2015. The report provides a clear, strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities in the Borough between 2015 and 2020. KKP were also appointed to undertake an assessment of the formal indoor sports need in the Borough. This report is known as the Indoor Sports Facilities Needs Assessment and provides a detailed assessment of current provision of indoor sports</p>	<p>Comments noted and overall support welcomed. However, residential uses are not considered 'complementary' to the main use of the site as a sport ground. In addition, residential uses would be entirely inappropriate within land designated as Metropolitan Open Land and contrary to local, London Plan and national policies.</p> <p>It should also be noted that proposals for floodlighting will need to comply with and be assessed against the relevant policies within this Plan, including Policy LP 9. In relation to indoor sports facilities, this could be considered as part of the 'complementary uses' of the site, provided they meet other policies and criteria within the Plan. No changes required.</p>
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										<p>policy and more specifically acknowledging the need for upgrading the existing facilities at the RAA ground, to address overplay and future demand. The recognition within the document that new facilities may require additional complementary development to support the costs of improving/replacing existing facilities is strongly supported by our client.</p>	<p>facilities, identifying outstanding needs and gaps in provision.</p> <p>The reports identify that the Richmond Athletic Ground currently accommodates seven standard quality senior pitches (four of which are floodlit) and has an aspiration to add indoor provision to make the site more attractive to different sports. The reports identify that significant overplay occurs and recognises that demand for further floodlit training facilities is likely to grow. The report goes on to note that such demand could be satisfied by improving pitch quality with the addition of floodlit training provision to alleviate pressure on match pitches.</p> <p>There is a clear acknowledgement within the Playing Pitch Strategy (August 2015) and the draft Old Deer Park SPD of a need for additional floodlit training provision to help alleviate pressure on match pitches. Although this is supported by the RAA, there should also be a clear acknowledgement within the draft Local Plan that floodlighting already exists on the site and new, improved replacement floodlights should be supported.</p> <p>The document notes that the Cannons Health and Fitness Centre on the site contributes to the supply of facilities in the Borough. Although this is acknowledged, the draft Local Plan should support the replacement of these facilities given their poor state of repair. We request acknowledgement within Site Allocation 23 that replacement indoor facilities would be supported.</p>	
364	113	Katharine Fletcher, Historic England	SA 23 Richmond Athletic Association Ground, Old Deer Park, Richmond							<p>See Publication Local Plan Comment IDs 340 and 350.</p>	<p>A new bullet point is needed highlighting that the site lies within an APA and that policy LP 7 applies. (See Appendix 8 to this document for the schedule of GLAAS comments)</p>	<p>Comments noted. The Council considers that it is not helpful to state that a particular policy would apply, such as LP7, because the assumption is that all policies within the Local Plan and other related adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan. This is also specifically stated within paragraph 12.1.6 of the Local Plan to avoid the need for cross-references.</p>

29	205	Robert Orr Ewing	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Pages 186 to 187 - Publication of Local Plan	No	No	Yes				<p>Pages 186 to 187</p> <p>1) School:</p> <p>a) The move from primary school in the original planning brief to secondary school has not been fully consulted with the local residents</p> <p>b) Concern that the demands from the developer will mean that the space allocated to a secondary school will be sub-optimal not providing sufficient space for buildings and ancillary grounds and not providing any future proofing (allowing for expansion)</p> <p>2) Density</p> <p>a) there is no mention of upper limits to housing density on the Brewery site; there is potential that this site will be overdeveloped (and substantially more densely populated than all other areas in Mortlake) impacting on local traffic, public transport and pollution levels.</p> <p>3) Green Spaces</p> <p>a) the local plan mentions re-provisioning of these playing areas which is inconsistent with the original planning brief which states that the playing fields are to be retained; There is concern that the competing demands for a school and the developers' desire to build will have a detrimental impact on the green spaces within in Mortlake.</p>	<p>Consideration to other options for school - other sites with better facilities, potential for expansion and with less impact on the local transport/traffic. An open consultation to present the rationale for a change from primary to secondary school.</p> <p>A better understanding on the impact the school and housing development will have on local vicinity, principally the green spaces and traffic. There needs to be more specific statements on maximum number of units on the Brewery site, what improvements are required to transport infrastructure and public transport in order to support this potential development.</p> <p>The local plan weakens the protection for green spaces in Mortlake. Mortlake, in comparison to other areas in LBRUT, has relatively few green open spaces. This plan has the potential to erode this further.</p>	<p>Comments noted. The change from a primary to a secondary school on this site was considered as part of the Cabinet report in October 2015 in relation to a revised School Place Planning Strategy, with specific reference to the forecast need for an additional secondary school in the eastern half of the borough. At that stage, it was decided that the Council would not review the adopted Planning Brief. However, the change in educational need and the priority for a secondary school on the Stag Brewery site was agreed to be taken forward as part of the Local Plan Review, which specifically sets out a site allocation for Stag Brewery. The Local Plan has now been subject to three rounds of public consultation, all of which mentioned the priority need for a secondary school on the Stag Brewery site. Therefore, the Council considers that extensive community consultation has been carried out.</p> <p>In relation to consideration of other sites for the school, a number of alternative sites for a secondary school were considered. The assessment of alternative sites included (1) Barn Elms Playing Fields, Barnes, (2) London Welsh RFC Ground, Old Deer Park, Richmond, (3) London Scottish & Richmond RFC Grounds, Richmond Athletic Ground, Richmond and (4) Pools on the Park, Old Deer Park, Richmond. However, all alternative sites have been discounted for a number of reasons, particularly as the majority would have required built development in land designated as MOL, and all the alternative sites are widely used and popular multi-sports use sites in the borough. It should be noted that the Council is working closely with the developer and the Education Funding Agency to ensure the delivery of the secondary school.</p> <p>The Council considers that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of</p>
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the secondary school “as set out in the Council’s School Place Planning Strategy” and adds that “the Council expects any redevelopment proposal to allow for provision of this school.”

I can understand the need for a new secondary school somewhere in the eastern part of the Borough (the current population in the state primary schools in this part being some 6,000 while the current population in the three state secondary schools is about 2,700). My concern, however, is that the provision of a new 6-form entry secondary school, plus sixth form – in order to be comparable with the other secondary schools – will require a site of about 4 ha including the existing sports fields, leaving only 4.6 ha for the housing development and new village centre for Mortlake (the total site area being 8.6 ha).

I am also concerned about the location of this secondary school. I have not seen the latest emerging plans and are wondering if the chosen location is alongside the Lower Richmond Road rather than on site of the primary school shown in the development brief. Schools should not be located alongside heavily congested roads with high pollution levels.

Whilst I accept that the appropriate location for a new secondary school should be on the north side of the railway serving Barnes, Mortlake and Kew, which have no secondary school, I am of the opinion that there is an alternative location on this side of the railway worth exploring. I am also of the opinion that the Brewery site is more suitable for a primary school, rather than the site proposed at Barnes Hospital (SA 27) which has such poor access.

The Sports Fields

The development brief states (para 5.38) that “the existing sports recreation ground on the site is allocated as Other Open Space of Townscape Importance. Future proposals for the site will need to ensure that the development adjacent to the area of open land has regard to the visual impact on the character of the open land. The Council will seek the retention of the two existing football pitches/one cricket pitch for increased public use.”

I note, however, that the 10th bullet (SA 24) states: “links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provide the opportunity to integrate the development and new communities with the existing Mortlake community.” While I support this aim we are concerned that there is no further mention of the retention and/or reprovision of the playing field.

I have not yet seen the emerging plans but I am much concerned that, in order to allow more space for the

• [Remaining text unchanged]

identifies the Stag Brewery site for a six-form entry secondary school, plus sixth form. It should be noted that a number of alternative sites for a secondary school were considered. The assessment of alternative sites included (1) Barn Elms Playing Fields, Barnes, (2) London Welsh RFC Ground, Old Deer Park, Richmond, (3) London Scottish & Richmond RFC Grounds, Richmond Athletic Ground, Richmond and (4) Pools on the Park, Old Deer Park, Richmond. However, all alternative sites have been discounted for a number of reasons, particularly as the majority would have required built development in land designated as MOL, and all the alternative sites are widely used and popular multi-sports use sites in the borough. It should be noted that the Council is working closely with the developer and the Education Funding Agency to ensure the delivery of the secondary school.

In terms of the location of the proposed secondary school, this will be discussed with the developer as part of the planning application process. The starting point for the location of the school is that identified in the Stag Brewery site brief.

The Local Plan and its policy do not propose building on the playing field, which is designated as Other Open Land of Townscape Importance (OOLTI). OOLTI has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. It is acknowledged that the OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum,

housing development and village centre, these sports fields may be sacrificed and that re-provision may take the form of a single all-weather football pitch. Such re-provision would not be acceptable.

These sports fields are a valuable local asset, they have never been built on and they were used as a training ground by the England football team before they won the World Cup in 1966.

The Housing Development I have heard that the developer is proposing to provide some 850 apartments plus 200 sheltered units.

We have also heard that the majority of the apartments will be 3- and 4-bedroom family units. The MBCG have calculated the density to be in the region of 420 habitable rooms per hectare. This is higher than the density of comparable recent developments on the Barnes and Kew Riversides and is similar to the density of the recently approved redevelopment of the Teddington Studios. It is also within the upper limit of 450 habitable rooms per hectare for development in an urban setting with limited public transport accessibility (as here) as given in the Greater London Authority's Supplementary Guidance on Density (2016).

However, part of the site has to be excluded from the calculations, namely the existing sports fields and the land required for the secondary school and village centre, and this could result in a significantly higher density (possibly twice as high). Such an increase in density would result in a significantly higher and more massive housing development which would reduce the quality of life for its residents and for the existing community.

It should be noted that according to the 2011 Census there are 4,771 households occupying 185 ha in the Mortlake/Barnes Common ward. The proposed 1,050 households (including 200 sheltered) should by the same token be occupying about 40 ha but will in practice be occupying nearly one tenth of that.

The increase in density will also have an adverse impact on traffic in Lower Richmond Road which is already congested in the peak hour due to constraints at the Chalkers Corner junction at one end and the Sheen Lane junction and railway level crossing at the other.

Overall Development

I am concerned that the emerging plans will show a serious overdevelopment of the site. I accept there is a need for more housing – in particular affordable housing – and for a secondary school but I am of the opinion that the two can not be provided together on the same site. MBCG have identified an alternative site for the school and have already made a separate submission to the Council in this regard.

quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances. However, it should be noted that any such re-provision would have to be on this site and not off-site or elsewhere in the Mortlake area.

To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. *This includes the retention and/or re-provision and upgrading of the playing field within the site.*"

In relation to the comments made on density, the Council considers that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. Policies need to be sufficiently flexible, for example to take account of changing market conditions, as well as deliverable, and therefore they should not be too prescriptive. The scale, density and massing of the proposed uses and the potential impacts of the proposal, including on character, transport, and amenity, will be assessed as part of consideration of a planning application. In addition, the developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies as well as the National Planning Policy Framework and national guidance. No further changes proposed.

48	182	Susan Money	SA 24 Stag Brewery, Lower Richmond Road, Mortlake								<p>I understand that it is no longer the case for the Mortlake Brewery playing field to be retained. I am shocked and saddened to hear that there is any possibility that the council will accept plans which remove this valuable asset. Such an action would be shortsighted and leave a large number of children with nowhere to work off their energy and socialise in healthy outdoor activity which reduces aggression, fights obesity and helps with social skills such as teamwork and communication.</p> <p>I also understand that rather than a primary school, a very large secondary school is now envisaged. Although education is obviously necessary, the impact that such a large volume of school children will have on Mortlake Green, its playground, the railway station and the roads is huge.</p> <p>I look forward to hearing that the playing field will remain.</p>	<p>Comments noted. The policy SA 24 is clear and requires the retention and/or re-provision and upgrading of the playing fields. The playing fields are designated Other Open Land of Townscape Importance (OOLTI), which has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. The OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land <u>within the site</u>, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances. However, it should be noted that any such re-provision would have to be on this site and not off-site or elsewhere in the Mortlake area.</p> <p>To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. <u><i>This includes the retention and/or re-provision and upgrading of the playing field within the site.</i></u>"</p>
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61	302	Steve Webb	SA 24 Stag Brewery, Lower Richmond Road, Mortlake								<p>I live at [address removed for confidentiality] and I would like to comment on the Publication Local Plan, SA 24 Policy Statement:</p>	<p>It is noted that the policy statement mentions: “The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required. Appropriate uses, in addition to educational, include sport and leisure uses including the retention and/or re-provision and upgrading of the playing field. The Council will expect the provision of high quality open spaces.... as well as a new publicly accessible green space link to the riverside.” The statement is followed by supporting text in 12 bullets. We have no argument with nine of these bullets but have comments on the 1st, 4th and 10th bullets as follows: Development Brief The 1st bullet states that “the Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site’s characteristics, constraints, land use and development opportunities.” Our concern is about a disconnect between the policy statement and the development brief with regard to the 4th and 10th bullets below. The Secondary School The development brief clearly states (para 5.20) that “the Council will support the provision of a two form entry Primary School” and that “the preferred location for any school facilities is adjacent to the existing sports fields in the south west area of the site.” The 4th bullet (DSA 24), however, re-iterates the need for the secondary school “as set out in the Council’s School Place Planning Strategy” and adds that “the Council expects any redevelopment proposal to allow for provision of this school.” We can understand the need for a new secondary school somewhere in the eastern part of the Borough (the current population in the state primary schools in this part being some 6,000 while the current 2 population in the three state secondary schools is about 2,700). Our concern, however, is that the provision of a new 6-form entry secondary school, plus sixth form – in order to be comparable with the other secondary schools – will require a site of about 4 ha including the existing sports fields, leaving only 4.6 ha for the housing development and new village centre for Mortlake (the total site area being 8.6 ha). We are also concerned about the location of this secondary school. We have not seen the latest emerging plans and are wondering if the chosen location is alongside the Lower Richmond Road rather than on the site of the primary school shown in the development brief. Schools should not be located alongside heavily congested roads with high pollution levels. Whilst we accept that the appropriate location for a new secondary school should be on the north side of the railway serving Barnes, Mortlake and Kew, which have no secondary school, we are of the opinion that there is an alternative location on this side of the railway worth exploring. We are also of the opinion that the Brewery site is more suitable for a primary school, rather than the site</p>	<p>Comments noted. The change from a primary to a secondary school on this site was considered as part of the Cabinet report in October 2015 in relation to a revised School Place Planning Strategy, with specific reference to the forecast need for an additional secondary school in the eastern half of the borough. At that stage, it was decided that the Council would not review the adopted Planning Brief. However, the change in educational need and the priority for a secondary school on the Stag Brewery site was agreed to be taken forward as part of the Local Plan Review, which specifically sets out a site allocation for Stag Brewery. The Local Plan has now been subject to three rounds of public consultation, all of which mentioned the priority need for a secondary school on the Stag Brewery site. Therefore, the Council considers that extensive community consultation has been carried out.</p> <p>In relation to consideration of other sites for the school, a number of alternative sites for a secondary school were considered. The assessment of alternative sites included (1) Barn Elms Playing Fields, Barnes, (2) London Welsh RFC Ground, Old Deer Park, Richmond, (3) London Scottish & Richmond RFC Grounds, Richmond Athletic Ground, Richmond and (4) Pools on the Park, Old Deer Park, Richmond. However, all alternative sites have been discounted for a number of reasons, particularly as the majority would have required built development in land designated as MOL, and all the alternative sites are widely used and popular multi-sports use sites in the borough.</p> <p>In terms of the best location for the school within the site, this will be discussed as part of the planning application process with the developer, although the starting point is the area highlighted within the adopted planning brief. It should be noted that the Council is working closely with the developer and</p>
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proposed at Barnes Hospital (SA 27) which has such poor access. The Sports Fields The development brief states (para 5.38) that "the existing sports recreation ground on the site is allocated as Other Open Space of Townscape Importance. Future proposals for the site will need to ensure that the development adjacent to the area of open land has regard to the visual impact on the character of the open land. The Council will seek the retention of the two existing football pitches/one cricket pitch for increased public use." We note, however, that the 10th bullet (SA 24) states: "links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provide the opportunity to integrate the development and new communities with the existing Mortlake community." While we support this aim we are concerned that there is no further mention of the retention and/or re-provision of the playing field. We have not yet seen the emerging plans but we are much concerned that, in order to allow more space for the housing development and village centre, these sports fields may be sacrificed and that re-provision may take the form of a single all-weather football pitch. Such re-provision would not be acceptable. These sports fields are a valuable local asset, they have never been built on and they were used as a training ground by the England football team before they won the World Cup in 1966. The Housing Development We have heard that the developer is proposing to provide some 850 apartments plus 200 sheltered units. We have also heard that the majority of the apartments will be 3- and 4-bedroom family units. We have calculated the density to be in the region of 420 habitable rooms per hectare. This is higher than the density of comparable recent developments on the Barnes and Kew Riversides and is similar to the density of the recently approved redevelopment of the Teddington Studios. It is also within the upper limit of 450 habitable rooms per hectare for development in an urban setting with limited public transport accessibility (as here) as given in the Greater London Authority's Supplementary Guidance on Density (2016). 3 However, part of the site has to be excluded from the calculations, namely the existing sports fields and the land required for the secondary school and village centre, and this could result in a significantly higher density (possibly twice as high). Such an increase in density would result in a significantly higher and more massive housing development which would reduce the quality of life for its residents and for the existing community. It should be noted that according to the 2011 Census there are 4,771 households occupying 185 ha in the Mortlake/Barnes Common ward. The proposed 1,050 households (including 200 sheltered) should by the same token be occupying about 40 ha but will in practice be occupying nearly one tenth of that. The

the Education Funding Agency to ensure the delivery of the secondary school.

Other Open Land of Townscape Importance (OOLTI) has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. It is acknowledged that the OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances. However, it should be noted that any such re-provision would have to be on this site and not off-site or elsewhere in the Mortlake area. To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. *This includes the retention and/or re-provision and upgrading of the playing field within the site.*"

The Council considers that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. Policies need to be sufficiently flexible, for example to take account of changing market conditions, as well as deliverable, and therefore they should not be too prescriptive. The scale,

and compliment the recently opened Thompson School. I do not see the benefit of another Primary School on the Barnes Hospital site as it is very close to the existing Barnes Primary School (unless the intent is to make this one and the same faculty as the current school has an excellent reputation).

- I do believe that the Brewery site should include a health centre and would want assurance that the local CCG and primary care providers (GPs) are being consulted about the population growth and consequential health and care needs. I would encourage the council to consider the Brewery site in the context of the river path and its significant use as a recreational and sport facility, it is heavily used all year by young and old for walking, running and cycling and it would be great to see this accommodated with perhaps an outside gym and running markers along with more paved sections to join up from the White Hart Pub to the Brewery site.

- In terms of commercial and recreational use, one of the joys of the community is its characterful pubs and independent restaurants - I would be unhappy if the redevelopment undermined the viability of existing businesses by the large corporate brands.
- Finally, a small and daily irritation is dog waste - as a non-dog owner can I make a plea for some dog waste bins along the river bank.

It is forecast that the children who are at most risk of not being admitted to any of the three schools in the eastern half of the borough live in Kew, and east and north Barnes. The updated School Place Planning Strategy (2015) therefore identifies the Stag Brewery site for a six-form entry secondary school, plus sixth form. It should be noted that a number of alternative sites for a secondary school were considered. The assessment of alternative sites included (1) Barn Elms Playing Fields, Barnes, (2) London Welsh RFC Ground, Old Deer Park, Richmond, (3) London Scottish & Richmond RFC Grounds, Richmond Athletic Ground, Richmond and (4) Pools on the Park, Old Deer Park, Richmond. However, all alternative sites have been discounted for a number of reasons, particularly as the majority would have required built development in land designated as MOL, and all the alternative sites are widely used and popular multi-sports use sites in the borough. It should be noted that the Council is working closely with the developer and the Education Funding Agency to ensure the delivery of the secondary school.

The policy refers to health facilities being appropriate uses for this site. The Council will expect the developer to undertake early discussions with the health bodies and the Richmond Clinical Commissioning Group to establish whether there is a need for health care facilities within this site.

In terms of the river path, note that other policies within this Local Plan, such as LP 18 River Corridors, set out certain requirements in relation to public access and riverside paths.

The Council will expect retail and other commercial uses that add to the vibrancy of the new centre and that contribute to the provision of local employment opportunities. It is also expected that the site will provide a mix of employment

40	213	Stephanie Pembrton	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Pages 186-187 Omission - Chapter 12 Site Allocations	No	No	No	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the extent legal compliance (box 4.(1)) and/ or the duty to co-operate (box 4.(3)) apply, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction. Throughout the rest of this document MBCG refers to the Mortlake Brewery Community Group, http://www.mbcg.org.uk SA 24 Policy Statement</p> <p>It is noted that the policy statement mentions: "The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required. Appropriate uses, in addition to educational, include sport and leisure uses including the retention and/or re-provision and upgrading of the playing field. The Council will expect the provision of high quality open spaces... as well as a new publicly accessible green space link to the riverside." The statement is followed by supporting text in 12 bullets. I have no argument with nine of these bullets but have comments on the 1st, 4th and 10th bullets as follows: Development Brief The 1st bullet states that "the Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities." My concern is about a disconnect between the policy statement and the development brief with regard to the 4th and 10th bullets below. The Secondary School The development brief clearly states (para 5.20) that "the Council will support the provision of a twoform entry Primary School" and that "the preferred location for any school facilities is adjacent to the existing sports fields in the south west area of the site." The 4th bullet (DSA 24), however, re-iterates the need for the secondary school "as set out in the Council's School Place Planning Strategy" and adds that "the Council expects any redevelopment proposal to allow for provision of this school." I can understand the need for a new secondary school somewhere in the eastern part of the Borough (the current population in the state primary schools in this part being some 6,000 while the current population in the three state secondary schools is about 2,700). My concern, however, is that the provision of a new 6-form entry secondary school, plus sixth form – in order to be comparable with the other secondary schools – will require a site of about 4 ha including the existing sports</p>	<p>Amend as follows, (i) replacing references to the secondary school with a primary school of the type approved in the 2011 adopted supplementary planning brief for the site and (ii) removing the reference to the 're-provision' of the playing fields. SA 24 Stag Brewery, Lower Richmond Road, Mortlake The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 2-form entry primary school, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside. [A corresponding change should be made to the text on page 107 of the Sustainability Appraisal Report as it relates to SA24.]</p> <ul style="list-style-type: none"> • The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities. • The brewery operations on this site have ceased at the end of 2015; the site has been marketed and sold. • There is a need to create a new village heart and centre for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities. • There is a clear need for a new primary school in this area. <p>Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.</p> <ul style="list-style-type: none"> • [Remaining text unchanged] 	See Officer response to Comment ID 45 above.
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fields, leaving only 4.6 ha for the housing development and new village centre for Mortlake (the total site area being 8.6 ha).

I am also concerned about the location of this secondary school. I have not seen the latest emerging plans and am wondering if the chosen location is alongside the Lower Richmond Road rather than on the site of the primary school shown in the development brief. Schools should not be located alongside heavily congested roads with high pollution levels.

Whilst I accept that the appropriate location for a new secondary school should be on the north side of the railway serving Barnes, Mortlake and Kew, which have no secondary school, I am of the opinion that there is an alternative location on this side of the railway worth exploring. I am also of the opinion that the Brewery site is more suitable for a primary school, rather than the site proposed at Barnes Hospital (SA 27) which has such poor access.

The Sports Fields

The development brief states (para 5.38) that “the existing sports recreation ground on the site is allocated as Other Open Space of Townscape Importance. Future proposals for the site will need to ensure that the development adjacent to the area of open land has regard to the visual impact on the character of the open land. The Council will seek the retention of the two existing football pitches/one cricket pitch for increased public use.”

I note, however, that the 10th bullet (SA 24) states: “links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provide the opportunity to integrate the development and new communities with the existing Mortlake community.” While I support this aim we are concerned that there is no further mention of the retention and/or re-provision of the playing field.

I have not yet seen the emerging plans but I am much concerned that, in order to allow more space for the housing development and village centre, these sports fields may be sacrificed and that re-provision may take the form of a single all-weather football pitch. Such re-provision would not be acceptable. These sports fields are a valuable local asset, they have never been built on and they were used as a training ground by the England football team before they won the World Cup in 1966.

The Housing Development

I have heard that the developer is proposing to provide some 850 apartments plus 200 sheltered units. We have also heard that the majority of the apartments will be 3- and 4-bedroom family units. The MBCG have calculated the density to be in the region of 420 habitable rooms per

										<p>hectare. This is higher than the density of comparable recent developments on the Barnes and Kew Riversides and is similar to the density of the recently approved redevelopment of the Teddington Studios. It is also within the upper limit of 450 habitable rooms per hectare for development in an urban setting with limited public transport accessibility (as here) as given in the Greater London Authority's Supplementary Guidance on Density (2016).</p> <p>However, part of the site has to be excluded from the calculations, namely the existing sports fields and the land required for the secondary school and village centre, and this could result in a significantly higher density (possibly twice as high). Such an increase in density would result in a significantly higher and more massive housing development which would reduce the quality of life for its residents and for the existing community.</p> <p>It should be noted that according to the 2011 Census there are 4,771 households occupying 185 ha in the Mortlake/Barnes Common ward. The proposed 1,050 households (including 200 sheltered) should by the same token be occupying about 40 ha but will in practice be occupying nearly one tenth of that.</p> <p>The increase in density will also have an adverse impact on traffic in Lower Richmond Road which is already congested in the peak hour due to constraints at the Chalkers Corner junction at one end and the Sheen Lane junction and railway level crossing at the other.</p> <p>Overall Development</p> <p>I am concerned that the emerging plans will show a serious overdevelopment of the site. I accept there is a need for more housing – in particular affordable housing – and for a secondary school but I am of the opinion that the two can not be provided together on the same site. MBCG have identified an alternative site for the school and have already made a separate submission to the Council in this regard.</p>	
80	242	Laura Rowan	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I wanted to write to put in words that we are in support of the proposal to build a new SECONDARY SCHOOL on the Brewery Site in Mortlake.</p> <p>I have two children at Thomson House and we do not know what we will do for secondary so the opportunity this would bring would be an amazing.</p>	Comments noted. Support welcomed.

81	152	Juliet Lally	SA 24 Stag Brewery, Lower Richmond Road, Mortlake	No	No	No	Yes	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.</p> <p>I endorse all the views expressed by Mortlake Brewery Community Group in its representation(s).</p>	<p>Amend as follows, (i) replacing references to the secondary school with a primary school of the type approved in the 2011 adopted supplementary planning brief for the site and (ii) removing the reference to the 'reprovision' of the playing fields.</p> <p>Suggested amended text</p> <p>8.2.11</p> <p>Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan:</p> <p>Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college</p> <p>Stag Brewery, Mortlake: provision of a new 2-form of entry primary school</p> <p>Ryde House, East Twickenham: provision of a new 2-form of entry primary school</p> <p>Barnes Hospital, Barnes: provision of 2-form of entry primary school</p> <p>13.1.7</p> <p>13.1.7 A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population.</p> <p>Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses:</p> <p>Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college</p> <p>Stag Brewery, Mortlake: provision of a new 2-form of entry primary school</p> <p>Ryde House, East Twickenham: provision of a new 2-form of entry primary school</p> <p>Barnes Hospital, Barnes: provision of 2-form of entry primary school</p> <p>SA 24 Stag Brewery, Lower Richmond Road, Mortlake</p> <p>The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 2-form entry primary school, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure</p>	See Officer response to Comment ID 42 above.
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uses, including the retention and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.

[A corresponding change should be made to the text on page 107 of the Sustainability Appraisal Report as it relates to SA24.]

- The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities.
- The brewery operations on this site have ceased at the end of 2015; the site has been marketed and sold.
- There is a need to create a new village heart and centre for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities.
- There is a clear need for a new primary school in this area. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.

• [Remaining text unchanged]

Table beneath SA 24 on page 107/108 of Sustainability Appraisal Report

Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport)

Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions)

Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed)

Row 7 - landscape and townscape - amend to add a negative (if large secondary school required)

Row 8 - parks and open spaces - amend to add a double negative (if any part of the playing fields are to be removed)

Row 12 - accessible local services - replace reference to 'secondary' with 'primary'

Summary of assessment to be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses

88	88	Jo Glynn	SA 24 Stag Brewery, Lower Richmond Road, Mortlake	No	No	No	Yes	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.</p>	<p>Amend as follows, (i) replacing references to the secondary school with a primary school of the type approved in the 2011 adopted supplementary planning brief for the site and (ii) removing the reference to the 'reprovision' of the playing fields.</p> <p>Suggested amended text</p> <p>8.2.11 Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan: Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form of entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school</p> <p>13.1.7 13.1.7 A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population. Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses: Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form of entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school SA 24 Stag Brewery, Lower Richmond Road, Mortlake The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 2-form entry primary school, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure</p>	<p>See Officer response to Comment ID 42 above.</p>
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56	168	Danny Masting	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I observe the proposals with great interest and support. While there is little doubt that greater provision of primary facilities would be helpful it is also true we must think bigger picture.</p> <p>If primary places are projected to be 6000 and public secondary school places are 2700, are we to assume that the other 3,300 are attending either being sent out of the borough on buses or going to private schools such as St Paul's, Harrodians etc etc?</p> <p>It seems to me that adding secondary school places to make provision for those leaving primary school is wise. My wife and I will never be able to afford private education and I would rather not 'bus' my son across the borough to an overcrowded school.</p> <p>I think therefore it is useful to present the proposals in a fashion that makes provision for children's exercise - it isn't as if the playing fields at Dukes Meadow's isn't accessible! These days there are many ways to show children ways to exercise that don't require huge pastures. Protecting green space has merit but a football pitch is probably used 15 hours a week, there are other green spaces such as Leg'O'Mutton, Riverside Walk, Wetlands Centre, Rocks Lane, Barnes Common, Richmond Park all of which are underused.</p> <p>If a football field is the sacrifice then I support the proposal for a state of the art secondary school. I've shared these views with the MBCG group.</p>	Comments noted. Support welcomed.
50	134	V Johnson	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I am writing to object in the strongest terms to the recent proposals for the redevelopment of the Mortlake Brewery Site which has been altered to include a 1,000 pupil secondary school instead of a small primary school. In terms of congestion of roads, railway and buses the area could not take this amount of people converging on it everyday. This area is already heavily congested without the school and also the added 1,000 residents in the proposed flats.</p> <p>It would also mean the loss of the green playing fields which are the heart and soul of this community for many local families.</p> <p>A small school is acceptable, a 1,000 pupil secondary school is not.</p>	<p>See Officer response to Comment ID 42 above.</p> <p>In addition, the developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies as well as the National Planning Policy Framework and national guidance. It should also be noted that other policies within the Plan will need to be complied with, including for example the transport policies LP 44 and LP 45. No changes required.</p>

100	121	Romayne Hortop	SA 24 Stag Brewery, Lower Richmond Road, Mortlake								<p>Plans for the development of the Brewery site are to be welcomed, especially as I understand they would include a cinema, retail outlets and community facilities. However, I have some concerns:</p>	<p>The Playing Fields: please retain the playing fields and do not build on them. It is an established fact that open green spaces are essential to people's mental health and well-being. Building on the fields would halve the open spaces in Mortlake.</p> <p>Secondary School: surely the site is not big enough to contain 1,000 houses <u>and</u> a 1,000-pupil secondary school. Not only would a school result in the loss of the playing fields but a cramped school would hardly benefit its pupils. Could a larger alternative site not be found?</p> <p>Transport: traffic is bound to increase, both during and post-construction. This would inevitably result in long queues not only on the road bordering the site but also at the level crossing at Mortlake station. As most car drivers do not cut their engines whilst stationary, the result would be increased pollution, detrimental to people's health. Moreover, situating a school on the site would also mean putting pupils' health at risk.</p>	<p>Comments noted and overall support welcomed.</p> <p>In relation to an assessment of alternative sites, please see the Officer response to Comment ID 42 above.</p> <p>The Policy does not propose building on the playing fields, which are designated Other Open Land of Townscape Importance (OOLTI). OOLTI has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. It is acknowledged that the OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances. However, it should be noted that any such re-provision would have to be on this site and not off-site or elsewhere in the Mortlake area.</p> <p>To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "<u>Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. <i>This includes the retention and/or re-provision and upgrading of the playing field within the site.</i></u>"</p> <p>The Council considers that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national</p>
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										<p>responsible for monitoring this youthful extra pedestrian traffic to and from the station? <u>Would there be a plan to use extra buses to reduce overcrowded platforms?</u></p> <p>My 3rd concern is that the <u>bins on Mortlake Green</u> are often left overflowing. Will extra bins be situated on Mortlake Green along with extra staff (?) to clean up debris that kids discard, so Mortlake Green doesn't resemble a picnic site.</p> <p>My 4th concern is that there are no public toilets in the Mortlake Green area NOR at Mortlake Station. Will provision be made for this requirement in view of the additional people, not just the school children but their also families?</p>	<p>To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. <u><i>This includes the retention and/or reprovision and upgrading of the playing field within the site.</i></u>"</p> <p>Whilst policing, provision of bins and public toilets are not matters for the Local Plan, the Council considers that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. The developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies as well as the National Planning Policy Framework and national guidance. No further changes proposed.</p>
102	116	Peter Holm	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I just would like to let you know that I support the proposal of a new secondary school on the Brewery site. We do really have a need for secondary schools in the area.</p>	<p>Comments noted. Support welcomed.</p>
103	8	Rachel Arnold	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I just wanted to register my support for the proposed Secondary School in the Brewery Site in Mortlake. I think this will be hugely beneficial for the local community.</p>	<p>Comments noted. Support welcomed.</p>

63	131	Adrienne Jack	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I wish to register my objection to certain elements of your new proposals for the development of the Mortlake Brewery site. My major concern is the introduction of a secondary school replacing the original offer of a primary school. As is well documented, a secondary school requires far more space for the building and far more for the play grounds. As I understand it, this revision of the original plans would necessitate a higher density of units to finance. I'm sure I need not go into all the knock on effects that this would produce - denser traffic on an already heavily trafficked road, more calls on schools, clinics and hospitals in the area.</p> <p>To my knowledge , you have not offered any rational for this change. It is difficult to see how you can justify it given the space in question and the community in which it is located.</p> <p>I would appreciate a response to this objection.</p>	See Officer response to Comment ID 45 above.
64	29	Amanda & Andy Bodley	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>We are writing to support the planned development of the Stag Brewery site in Mortlake, and in particular the proposal for a secondary school. We live close to the site. The local area, and South West London more generally, is in desperate need of additional state secondary education.</p> <p>A secondary school on this site could help further the excellent education of the children leaving the numerous OFSTED Outstanding primary schools in the neighbourhood, and continue the community spirit that those schools have so well created.</p> <p>In addition, being so close to the river and being made up of a large green space, the site would provide a wonderful environment for children to learn.</p>	Comments noted. Support welcomed.

106	148	Rick Kumar	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I am writing with regards to the plans for a Secondary School on the Brewery Site in Mortlake, http://www.mbcg.org.uk/local-plan-publication-feb-17.pdf</p> <p>This is such a fantastic idea, and the thoughts of bringing a new Secondary School to the area is just what the local area currently needs. With so many fantastic primary schools in the area, the thought of a progressive secondary school is just what parents are looking for. You approved Thomson House in Mortlake a few years ago, and this school has grown from strength to strength, producing outstanding teaching and engaged, smart and bright children in the local area. But, a number of the other primary school are outstanding too and these young local minds certainly need a local secondary school they can thrive in.</p> <p>Unfortunately demand is high for secondary schools, and supply is low. So many people are forced to move out of the area, or send their children to private schools as the options simply aren't there. But a new school would allow parents the choice and would encourage people to stay in the local area and build on what is already a lovely community.</p> <p>The location is perfect for this school - close to the local area and housing, near to the local train stations, good bus access and a clear road running on both sides of the school. Not only will this be good for the local community, the local businesses would thrive too. I also believe that a school like this, and with your already fantastic primary schools, would encourage more people into the borough.</p> <p>Please approve this school, it would be fantastic for the area.</p>		Comments noted. Support welcomed.
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107	164	Jo Mallabar	SA 24 Stag Brewery, Lower Richmond Road, Mortlake								<p>I am writing as a property owner on Thames Bank to express my concerns regarding the Brewery Development. We live at Aynescombe Cottage on Aynescombe Path in the top cottage which is next to Ship Alley and the now blocked alley that runs parallel to the wall of the brewery. We have two main concerns:</p> <p>1. Our cottage will be directly affected by whatever is built on the land directly behind us. We are very concerned that if flats are built close to the wall and above three stories that they will destroy the privacy and light (this we understand is a legal matter) of our garden. If town houses are built, this would be preferable. However, again, we would hope that they were set away from the wall with their back gardens extending to the wall. This would ensure the light was not affected to our property.</p> <p>2. Regarding the proposed plan for the increased housing and secondary school, we are very concerned about the increase in traffic and pollution levels. The crossing at Mortlake Station is already an extreme health hazard in this area. Pollution levels in Mortlake must be responsibly addressed by Richmond Council as a policy priority.</p>	<p>Comments noted. The scale, density and massing of the proposed uses and the potential impacts of the proposal, including on character, transport, and amenity, will be assessed as part of consideration of a planning application. In addition, the developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies as well as the National Planning Policy Framework and national guidance. It should also be noted that other policies within the Plan will need to be complied with, including for example Policy LP 8 Amenity and Living Conditions as well as the transport policies LP 44 and LP 45. No changes required.</p>
66	43	Bec Carty	SA 24 Stag Brewery, Lower Richmond Road, Mortlake								<p>My two children currently attend Thomson House School. This is a short note to express my support for the proposal to build a secondary school at the Mortlake Brewery site. I sincerely hope a secondary school is built and that my children get to attend it.</p>	<p>Comments noted. Support welcomed.</p>
109	39	Sara Campin	SA 24 Stag Brewery, Lower Richmond Road, Mortlake								<p>I would like to support the development of a secondary school on the brewery site. There is a fantastic opportunity for the community to build an excellent secondary school that could be fed from the excellent surrounding schools including Thomson house. We have excellent primary schools but there is a significant gap for an excellent secondary school in the area. Please note my support for this application.</p>	<p>Comments noted. Support welcomed.</p>

this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population. Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The local Plan identifies the following sites for educational uses:

Stag Brewery, Mortlake: provision of a new 2-form of entry primary school

Ryde House, East Twickenham: provision of a new 2-form of entry primary school

Barnes Hospital, Barnes: provision of 2-form of entry primary school

SA 24 Stag Brewery, Lower Richmond Road, Mortlake

The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 2-form entry primary school, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.

[A corresponding change should be made to the text on page 107 of the Sustainability Appraisal Report as it relates to SA24.]

The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities.

The brewery operations on this site have ceased at the end of 2015; the site has been marketed and sold.

There is a need to create a new village heart and centre for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities.

There is a clear need for a new primary school in this area.

Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.

[Remaining text unchanged]

113	297	Lucinda Vanderhart	SA 24 Stag Brewery, Lower Richmond Road, Mortlake									I am emailing in support of the proposal to build a secondary school at the Mortlake Brewery site. My children are at Thomson House. A secondary school of the same excellent standard would be a huge benefit to the Mortlake area.		Comments noted. Support welcomed.
78	220	Linda Pettitt	SA 24 Stag Brewery, Lower Richmond Road, Mortlake	No	No		Yes	Yes	Yes	Yes		<p>The 2011 development brief (para 5.20) states that the Council will support the provision of a two form entry primary school. However the (SA 24) (4) brief says the Council expects any redevelopment proposal to allow for a 6th form secondary school!</p> <p>There are already eleven state secondary schools in the borough of Richmond; if yet another is to be built, the Brewery site is not the best location. The area required to build a 6th form secondary school would be approximately 4ha, leaving just 4.6ha for the residential units and village center. It would also be extremely detrimental to the health and wellbeing of the children attending either a primary or secondary school. They would be exposed to intolerable levels of air pollution on a daily basis! Lower Richmond Road is continually choked with slow moving, heavy traffic emitting illegal levels of poisonous fumes.</p> <p>LBRUT have been monitoring levels in keeping with their Air Quality Plan; in 2015 the borough was deemed to represent worse-case exposure! http://www.richmond.gov.uk/air_quality_update_and_scr_eening_assessment_2015.</p> <p>Over six years, researchers examined the lung function of 2,400 children at 25 schools across East London and found a direct correlation between air pollutant exposure and reduced lung growth. Such children have an increased risk of lung disease and the prospect of a permanent reduction in lung capacity. The study was led by Prof Chris Griffiths, principal investigator at the Medical Research Council and Asthma UK Centre in Allergic Mechanisms of asthma. http://www.telegraph.co.uk/journalists/lauradonnelly/11953613/Air-pollution-stunting-childrens-lungs-study-finds.html.</p> <p>The impacts of air pollution go beyond asthma and other respiratory disease as well as heart attacks and strokes. The International Agency for Cancer Research has formally classified outdoor air pollution as a carcinogen.</p> <p>Researchers from King's College London found the number of premature deaths caused by air pollution was higher than previously thought. Nearly 9,500 people died early in a single year in London as a result of long-term exposure to air pollution.</p>	<p>A justified explanation on changes to the development brief Justification for a new secondary school rather than expansion of existing secondary schools.</p> <p>The justification of the school being on the Brewery site as opposed to other sites and if any other sites have been assessed.</p> <p>Playing field clarification.</p> <p>Clarification on the density of the housing.</p> <p>Traffic implications, mitigation measures, if any.</p>	See Officer response to Comment ID 45 above.

<http://www.independent.co.uk/news/uk/home-news/nearly-9500-people-die-early-in-a-single-year-in-london-as-a-result-of-air-pollution-study-finds-10390729.html>

Putting a school on the site would condemn a generation of children to ill-health. On-going daily use of a playground alongside a road where the atmospheric pollution is much greater than the government standards would be unsafe and totally unacceptable.
www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution.

Brixton Road breached annual air pollution limits in the first week of 2017. Putney High Street breached the annual legal limit in the first week of 2016. If a monitoring vehicle was placed on Lower Richmond Road close to the site of any planned school, I suggest the level of pollution would register a very similar reading to that of both the aforementioned locations.

<https://www.theguardian.com/environment/2015/jul/07/almost-all-london-boroughs-failed-eu-air-pollution-limit-for-toxic-no2-gas>

Regarding the playing field, I believe it should remain free and accessible for community use and weekly football sessions, as it has been for many years. If it were to be built on, it would halve the open space in Mortlake. Keeping (green lung) open space in a high density development is vital. Once it's built on, it is lost to the community forever.

Lower Richmond Road has two major bottlenecks between Mortlake Station and Chalker's Corner, the crossroads of two arterial roads of London. The development sited in between would inevitably increase traffic volumes considerably on the already heavily congested road. It would cause huge inconvenience to road users coming in and out of the area from every direction with knock on effect, even without factoring in a school of any kind. Finding a solution to this serious traffic issue will not be easy, if at all possible! The large numbers of extra residents leaving and returning to the site would have no alternative route to use and the area would quickly become gridlocked. The many workers needed to man the new facilities on the site, plus shoppers coming into Mortlake on a daily basis would without doubt put a huge strain on the limited public transport. The impact would be immense!

Mortlake is about to undergo a complete transformation;

the developers and Richmond town planners do have a duty and responsibility not to over-develop the site. Doing so would change Mortlake from a wonderful, peaceful, place to live, into a seriously over crowded, excessively noisy, perilously polluted area.

The Local Plan has a Health Impact Assessment, 1.4.2. I would suggest serious consideration needs be taken before a final decision is made on the long term plan; particularly regarding the detrimental health impact that a development of this size would most certainly have on all local residents. There will be several years of construction work to endure, which will have a negative effect on well-being. It will cause severe disturbance of the peace. Huge vehicles will be clambering along Lower Richmond Road spewing out toxic fumes and the non-stop noise of hammering, banging and metal clattering on a daily basis with NO ESCAPE will certainly cause overall stress. The inevitable building dust in the air is also a matter of great concern.

I have highlighted the Councils aims in bold, taken from the Local Plan, they are as follows:

Local Plan Strategic Vision
Residential quality of life.

The amenity of residents and local neighborhoods will have been protected and action taken on environmental issues and pollution. The quiet and peaceful nature of the borough will continue to ensure that all Richmond borough residents cherish their local area as a place to live.

2.3 Strategic Objectives 2.3.1

The Local Plan outlines what will need to be achieved to deliver the strategic vision?

The borough will be promoted as an attractive and inviting place; visitors will come to the borough to enjoy the many tourist attractions.

Vision and Objectives 2

2. A Sustainable Future

The new development will have respected the borough's environmental capacity and constraints through the optimization of land.

4. Reduce or mitigate environmental impacts and pollution levels (such as air and noise) and encourage improvements in air quality, particularly along major roads and areas that already exceed acceptable air quality standards.

5. Ensure local environmental impacts of development are

										<p>not detrimental to the health, safety and the amenity of existing and new users or occupiers of a development or the surrounding area.</p> <p>Apart from lung disease, living close to a busy road increases the risk of Alzheimer's and other forms of dementia by up to 12% a major study has found!</p> <p>I believe the aims set out in the Local Plan are unrealistic and unachievable! If permission was granted for all of the following listed in the plan i.e. 1,050 housing units, a 6th form secondary school, bus station/turn round, health & leisure facilities, health care centre, community hub, cinema, museum, hotel, cafés & restaurants, offices and retail units; it would undoubtedly result in a much higher density development.</p> <p>In 2011 Mortlake's population was recorded as 10,919, if the proposed plan of 1,050 units was permitted, Mortlake's population could very likely be increased by up to 30-40%. It would be disproportionate to the extreme and totally unacceptable to cram a development of this magnitude into an area of approximately 5% of the whole area of Mortlake & Barnes ward. It would detrimentally change the face of historic Mortlake forever.</p> <p>Apart from the large increase in population and work force on the site, there would be high volumes of visitors coming into the area on a daily basis from morning until night, with the real possibility of anti-social behaviour. The Local Plan states the borough will be promoted as an attractive and inviting place to visit and enjoy. See above text. However it would not be so enjoyable for residents living close by to the hustle and bustle of the crowded, noisy new face of Mortlake.</p>	
73	79	Joanna Fiddian	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I have read the proposed plan for the development of the Brewery Site in Mortlake, and I am delighted to see that there are now plans for a new secondary school there. The shortage of secondary school places is a great concern to me, as a mother of two young children, and as a member of the community in which I witness many families moving out of the area because of the lack of good quality state secondary schools. The brewery site would be a perfect location for the community. I recognise there are local residents who do not support this proposal but I would urge you to consider the needs of the future generations. I would be particularly keen to see a link between the new secondary school and the existing primary school Thomson House, which is nearby and excellent.</p>	Comments noted. Support welcomed.
118	123	Liz & Tim Hughes	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I'd like to register my support for a secondary school on the Mortlake Brewery Site with equivalent playing fields (to the ones there at the moment). We are desperately in need of more secondary school places and this site would be well placed to host such a school.</p>	Comments noted. Support welcomed.

76	194	Katja Nartey	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>In light of the plans to develop the brewery grounds in Mortlake I would like to express my support of founding a secondary school there.</p> <p>Whilst we have a great selection of outstanding primary schools in the local area there is a deficit of local secondary schools. This results in families moving away from the area resulting in a negative impact to our community due to valuable community members being forced to move out of the area</p>	Comments noted. Support welcomed.
79	201	Gbadabo Ogunlami	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I live on the Lower Richmond Road close to Chertsey Court reasonably near the brewery site.</p> <p>Other than the proximity of Chalkers Corner, a notorious traffic spot, the A3003 (when it is not a moving car park) is now regularly the scene of serious accidents and the attendant HSE closures. To add 1000 new residents would be to endanger human lives not only in traffic pollution terms but also in added incidents.</p> <p>The parking in the area is already a challenge with several narrow and some private roads in the immediate vicinity of the site.</p> <p>The site itself is ill served by narrow roads some of which are partially flooded at high tide. It also is an alternative route to the M3 that gets round Kew Bridge and the often closed for repairs Hammersmith Bridge.</p> <p>Mortlake station and Barnes Bridge station are slow train stops with restricted services and platform length constrains that would bottleneck considerably should your proposal be adopted.</p> <p>It would also be destroying the tranquility of the riverside tow path very much along the lines of the Mortlake riverside development of recent construction.</p> <p>Few houses and more family friendly green spaces should be preferred to developer driven concentration without infrastructure provision.</p>	Comments noted. The scale, density and massing of the proposed uses and the potential impacts of the proposal, including on character, transport, and amenity, will be assessed as part of consideration of a planning application. In addition, the developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies as well as the National Planning Policy Framework and national guidance. It should also be noted that other policies within the Plan will need to be complied with, including in relation to the River Corridors LP 18, including the requirement for public access / riverside path. No changes required.

121	86	Sarah Garrett	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I write concerning the proposed development of Stag Brewery, Mortlake.</p> <p>Myself and my husband and family have lived and worked in this area for over 20 years, we have three children who have all attended primary school in Mortlake. We feel strongly about the potential negative effects this development in its current proposed format will bring about to Mortlake, Barnes and East Sheen and its residents.</p> <p>The main issue that we are alarmed by is the sheer number of proposed homes being built in this relatively small space which is hemmed in by the river on one side, the A316 on another and Lower Richmond road and its historic housing on the third. The lack of infrastructure planning for such an enormous upwards shift in the population of a village-like area is completely inappropriate.</p> <p>Let's start with the proposed 1000 homes and the obvious increase in traffic that these homes will bring. We already struggle in this area with hideous congestion and frequent grid-lock at Chalker's Corner junction, along the Lower Richmond Road up to Barnes, and beyond on a really bad day! In London we are already experiencing pollution levels which, directly or indirectly, kills 10,000 people each year according to figures released in 2015. This January it took only five days before London had surpassed its annual air pollution limits. We know that the problem is exacerbated by polluted air being trapped by high rise buildings – Putney High Street is currently the most polluted street in London. An area where heavy traffic is regularly grid-locked at a point where it converges from numerous points to cross the Thames – ring any bells?? With the introduction of retail units, restaurants and entertainment as well as this density of residential property I can foresee that Mortlake will become the next Putney High Street, and the local residents will be suffering the consequences of this badly thought through proposal for generations to come.</p> <p>Whilst we all accept that there is scarcity of affordable housing in London, I think we all know what we will see in this 'Riverside Development' is unlikely to be affordable homes for local young people or first time buyers. It is likely to be exactly the type of housing which can reap the highest possible level of profit for the developers – luxury homes. The kind of purchaser of this type of property is unlikely to be prepared to live without at least one car, but potentially will own two or more per property. You do the</p>	<p>I would very much hope that this proposal is revisited and a more suitable plan put forward for consultation with local people.</p>	<p>See Officer response to Comment ID 45 above.</p>
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maths.

The next challenge I would present is that of the lack of any public transport network in this area which could even begin to cope with this increase in number of passengers. The trains are already over-full to bursting at peak times, the buses struggle to get through the traffic to Avondale Road terminal, the 419 is not worth bothering with as it is as unpredictable as the new US President. How are these residents expected to get to work? Will they be clinging onto the roof of the Waterloo Trains rather like in Mumbai or Delhi?

Doctors in Sheen and Barnes are already struggling to cope with the numbers of patients they are dealing with, Hospitals in South West and West London are overflowing. The Primary Schools have little if no capacity. You have decided with zero consultation that we need a Secondary School. Why? What evidence is there? There is a far more suitable site for a Secondary School, if indeed we do need one, on South Worples Way on the old Barnes Hospital Site. Why would you choose to decimate one of the very few green spaces in Mortlake? The Brewery green space is used by the community on a regular basis and would be used even more widely with a small amount of investment. This is the type of decision which defies logic.

I have read the National Planning Policy Framework document. This document clearly states the following:

*“The purpose of planning is to help achieve sustainable development.
Sustainable means ensuring that better lives for ourselves don’t mean worse lives for future generations.”*

I would suggest that creating this overly dense new development which offers poor transport links, little if any green space for local families, low levels of affordable housing for local people, no appropriate education or health infrastructure, and potentially a highly toxic environment caused by soaring levels of traffic pollution does not ensure better lives either for current or future generations in Mortlake, East Sheen or Barnes.

82	154	Katie Lee	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							As a resident of Mortlake, in North Worple Way, I am very excited by the prospect of the development of the Brewery site and the new life it will bring to the area. However I have grave concerns at the over ambitious requirement for a secondary school on the site and the lack of protection for the existing playing fields. the fields are an integral part of the site, are used constantly and should not be sacrificed. London has thrived as a growing city by protecting key features and in particular the open spaces.	So I would request that an alternative site is found for the secondary school, and that the playing fields preservation are a non-negotiable part of the development plans.	Comments noted. Support welcomed. In relation to the concerns around the secondary, see Officer response to Comment ID 42 above, which explains the need for a secondary school and alternative sites considered. In terms of the playing fields, the Local Plan and its policy do not propose building on the playing field, which is designated as Other Open Land of Townscape Importance (OOLTI). OOLTI has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. It is acknowledged that the OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances. However, it should be noted that any such reprovision would have to be on this site and not off-site or elsewhere in the Mortlake area. To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. <i><u>This includes the retention and/or reprovision and upgrading of the playing field within the site.</u></i> "
124	309	Mark Worled	SA 24 Stag Brewery, Lower	No		Yes	Yes		I have very significant concerns about certain aspects of the draft Plan – specifically in relation to the	The text in Section SA 24 of the Local Plan should reflect fully and without compromise the content of the already-	See Officer response to Comment ID 45 above.	

	ge	Richmond Road, Mortlake							<p>redevelopment of the Stag Brewery site (SA 24 on pages 186-187). I consider the draft Local Plan breaches the "Soundness" requirement by failing to be fully "Justified" and "Effective".</p> <p>I believe the Development Brief for the Stag Brewery site (written by the Council in 2011) was overall an excellent document, and it is a document that achieved wide public support through extensive consultation. I am now very concerned to see the Council deviating significantly from some important elements of the Development Brief in the draft Local Plan. My overall complaint with the draft Local Plan is simply that: there should be no deviation from the Development Brief. The deviations are not justified and the revised proposals are likely not to be "effective" because they are incompatible with constraints relating to the site.</p> <p>Within that overall complaint, I have three specific objections:</p> <p>1. Threat to retention of the playing fields The draft Local Plan contains an unacceptable weakening of the commitment made in the Development Brief about the playing fields on the Stag Brewery site. The Development Brief states, "The Council will seek the retention of the two existing football pitches/one cricket pitch." Instead, the draft Local Plan refers instead to "the retention and/or reprovion" of the playing field. Addition of "reprovion" as an alternative can be interpreted only as a signal that the Council is now willing to renege on the commitment to retention adopted by the Council (with public support) in 2011. Any renegeing on the commitment to protect and preserve the playing fields is an unjustifiable and unacceptable deviation from the Development Brief. Such renegeing would appear prima facie also to be a clear breach of principles explicitly incorporated by the Council into the remainder of the draft Local Plan (e.g. Policy LP 14 on "Other Open Land of Townscape Importance" and Policy LP 31 on "Public Open Space, Play Space, Sport and Recreation"). This makes it both not Justified and also contrary to Effectiveness as measured by successful compliance with the Council's own policies</p> <p>2. Substitution of a secondary school in place of a primary school The Development Brief envisaged incorporation of a primary school onto the Stag Brewery site, and this was widely welcomed. Replacement of that idea with the proposal to incorporate a secondary school onto the site is</p>	<p>approved Development Brief covering the Stag Brewery site. In particular:</p> <ol style="list-style-type: none"> 1. The words "and/or reprovion" should be deleted concerning the playing fields, so that retention is confirmed as the sole acceptable option. 2. The Development Brief's agreed proposal of incorporation of a primary school should be retained (instead of the now-proposed substitution of a secondary school instead) unless and until such a substitution can be demonstrated convincingly to be justified (by the absence of alternative sites) and effective (in respect of the impact on transport requirements and congestion). 3. The robust language of the Development Brief concerning the Council's requirements should be reflected accurately and fully in the Local Plan. <p>Overall, the best text for SA 24 would be simply to say, "The Council continues to stand in full by the content of the Development Brief adopted in 2011".</p>	<p>In addition, the comments under point 3 are noted and the following minor change is proposed to the 7th bullet point, replacing 'would' with 'should': "Incorporating a mix of uses, including social infrastructure and community as well as leisure, sport and health uses, and attractive frontages <u>should</u> contribute to creating an inviting and vibrant new centre."</p>
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a major change, and one that I believe is impracticable in terms of its overall impact on the site.

As well as perhaps contributing to the threat to the playing fields (see Item 1 above), the larger buildings footprint required for a secondary school would condense the space available on the remainder of the site – leading to a likely compromising of the public amenities envisaged in the Development Brief – and would also very significantly increase traffic flows in an already congested area.

I believe substitution of a secondary school in place of a primary school fails the tests both of Justification and Effectiveness:

- Better alternative sites for an additional secondary school in Richmond have been identified and proposed – specifically a range of options at Barn Elms. Without comprehensive assessment and refutation of the proposal to situate the school at Barn Elms instead, the “shoehorning” of a secondary school into the Stag Brewery site should not be permitted as it has straightforwardly not been “justified”.

- Traffic bottlenecks and extremely poor bus provision in the immediate vicinity of the Stag Brewery site (only one bus every 15 minutes along Lower Richmond Road) mean that inclusion of both a secondary school and a significant number of new dwellings on the site cannot be effective. Although the site is comparatively large, the fact that it is bounded by the river on one side and (nearby) by a railway line with very limited crossing capacity (the often-closed Sheen Lane level crossing and the bridge on the comparatively small/low capacity South Circular Road) means that the only “effective” development possible is considerably lower density than now appears to be envisaged.

3. Softening of language from “will” to “would”

I am deeply suspicious of use of the word “would” in the draft Local Plan, for example: “Incorporating a mix of uses, including social infrastructure and community as well as leisure, sport and health uses, and attractive frontages would contribute to creating an inviting and vibrant new centre.” Well, yes, of course it “would”, but unless such features are mandated by the Plan (through use of “will”, “must” or at the very least “should”) then such statements remain nothing better than a baseless wish. By contrast, the Development Brief uses far more robust language: “The Council will require ...” In the absence of any stated justification for this deviation from the language used in the already-approved Development Brief, the changes proposed in the draft Local Plan should not be accepted.

111	47	Tina Christison	SA 24 Stag Brewery, Lower Richmond Road, Mortlake								I wanted to express my support for the development of a secondary school on the Brewery Site. With so many outstanding primary schools in the area we need a secondary school to support these children. Without this we risk many families leaving the area.		Comments noted. Support welcomed.
89	108	Anne Haywood	SA 24 Stag Brewery, Lower Richmond Road, Mortlake								I am very worried about loosing the playing fields at the brewery to build a secondary school. We need as much green space as we can and Mortlake has very little. I am also extremely worried about the affect on local transport. There are not enough trains to support the community as it is. There is always lots of traffic around f that whole area and much congestion. I can not see how the whole transport network can cope. Trains are already packed in the morning and the platforms are over crowded. Even if more trains were laid on then the barriers at Mortlake would be down constantly.		Comments noted. Other Open Land of Townscape Importance (OOLTI) has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. It is acknowledged that the OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances. However, it should be noted that any such reprovision would have to be on this site and not off-site or elsewhere in the Mortlake area. To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. <u><i>This includes the retention and/or reprovision and upgrading of the playing field within the site.</i></u> " The scale, density and massing of the proposed uses and the potential impacts of the proposal, including on character, transport, and amenity, will be assessed as part of consideration of a planning application. In addition, the developer / applicant will be required to submit a

133	259	Christopher Simmons & Sabine Young	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>We are writing to object in the strongest possible terms to the recent proposal to include a 1000 pupil school in the redevelopment of this site. This is a most significant change from the original proposal adopted by yourselves in 2011.</p> <p>The original proposal to provide living accommodation for potentially 1000 new residents would suggest that the road transport provisions will be unable to meet the future requirements, given that the existing road transport provisions are already inadequate due to the traffic build-ups from delays at the Sheen Lane level crossing and especially for any emergency gas and water works. The addition of a 1000 pupil school would generate a considerable amount of extra traffic, especially during start/finish times, potentially creating a traffic gridlock for those travelling to/from the school and all Mortlake resident's during those periods.</p> <p>I trust that LBRUT will be able to develop/redevelop an alternative site to provide school facilities in a location with a good road transport infrastructure.</p>	See Officer response to Comment ID 42 above.
94	190	Victoria Mowat	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I am writing to express my strong objection to the recent proposal for the redevelopment of the Mortlake Brewery site to include a 1000 pupil secondary school. This is a significant change from the original proposal that was approved in 2011.</p> <p>My main concern with this new proposal is transport. During peak hours the traffic in the area around the brewery is already backed up into Mortlake High Street, causing significant pollution for the homes nearby and frustration for those trying to travel. 1000 new residents all needing to travel each day is already going to create more difficulties. The addition of a school with parents dropping their children off at the same time will cause complete chaos and gridlock. It just won't work.</p> <p>The train station is already very crowded in the mornings and I suspect will not be able to support many children from outside the area attending the school travelling in this way. More trains are not the solution as the barriers on Sheen Lane are already only open for about 18 minutes in the hour to allow cars to cross the rail tracks, and this causes some of the gridlock into Mortlake High Street mentioned above as cars are backed up to the mini roundabout. More trains will just make this situation worse.</p> <p>There does not appear to be a useful way to resolve this situation. The level crossing is necessary to get to the</p>	<p>In relation to an assessment of alternative sites, please see the Officer response to Comment ID 42 above.</p> <p>The Council considers that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. Policies need to be sufficiently flexible, for example to take account of changing market conditions, as well as deliverable, and therefore they should not be too prescriptive. The scale, density and massing of the proposed uses and the potential impacts of the proposal, including on character, transport, and amenity, will be assessed as part of consideration of a planning application. In addition, the developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies, including the relevant transport policies, as well as the</p>

									<p>south side of the tracks, so cannot be removed; the roads around the site cannot be widened in a meaningful way, due to housing on both sides; and the cost of tunnelling underneath the tracks I would imagine is extortionate, especially given the proximity to the river, and would cause significant inconvenience while it was being built. If you attend the site on any weekday in the school term you will be able to understand the problem.</p> <p>In addition, Hammersmith Bridge is frequently closed for repairs, causing cars to divert past the site and adding additional pressure to the infrastructure.</p> <p>For all of the above reasons, I believe that the proposed secondary school will provide insurmountable transport difficulties. I understand that there are several alternative and better sites at that are under consideration, and I think it would be much better to look at those sites than at the brewery.</p> <p>I would also request that the number of dwellings available at the brewery site should be looked at again, in light of all the transport difficulties that they will engender.</p>	National Planning Policy Framework and national guidance.
95	75	Jamie Farrow	SA 24 Stag Brewery, Lower Richmond Road, Mortlake						<p>We hereby support the proposal of a much needed new secondary school in this expanding and historically important local area.</p> <p>Due to the growing local population and push for suitable secondary schools in the surrounding areas - Hammersmith, Chiswick, Putney - there is a clear need for a new 6 form of entry school, plus a sixth form, in this area.</p> <p>It will provide local residents, working mums and dads the opportunity to get their children to school on time and commute to their own busy destinations.</p> <p>It will provide a healthy and nurturing infrastructure of new businesses, cafes, retail opportunities for an area which has great potential but has suffered from a lack of development for a long time.</p> <p>There is a clear desire by local residents - and those further afield - to support this important and necessary new opportunity which will be hugely beneficial for this generation and most importantly deliver a sense of pride, achievement and educational ambition for this underused site with immense potential to supply a clear and evident demand from parents, children and their peers alike.</p>	Comments noted and support for secondary school welcomed.

136	40	David & Virginia Carr	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>We are writing to express our concerns regarding the proposed redevelopment of the Mortlake Brewery site as addressed in your Local Plan.</p> <p>Firstly we would confirm that we are entirely supportive of the comments made in the MBCG's submission to you relating to your Local Plan. In particular we are alarmed at your thoughts on the construction of a large secondary school and the impact this will have on the loss of the existing playing field and the density of housing on the remainder of the site.</p> <p>An area of special concern to us is that of air pollution which is only mentioned in passing in the MBCG's remarks. While we have seen no current pollution measurements for air quality on the Lower Richmond Road adjacent to Williams Lane and Chalker's Corner we can only presume that they would be high during periods of peak traffic. We have read of estimates of an increase in traffic of 50 percent if the redevelopment as proposed proceeds. Whether this figure is correct or not a substantial increase in air pollution levels cannot but fail to occur immediately outside the proposed school if the redevelopment were to proceed as envisaged.</p> <p>How can such a plan be in anyway consistent with the London Mayor's determination to reduce pollution levels in the city with the introduction of daily " toxicity charges" and talk of a diesel scrappage scheme? How can it sit beside reports of schools being provided with pollution monitors so they can ensure pupils are not put at risk playing outside during their breaks? How is it consistent with reports of pollution causing an estimated 40,000 premature deaths in Britain every year with diesel vehicles being a large contributor to the problem?</p> <p>If correctly reported Lord Trew has told members of the MBCG that he is " obligated by statute " to provide secondary school places in the borough. Is he not also legally obligated to protect the health and wellbeing of the young people educated in the area? We fail to see how building a large secondary school on the Lower Richmond Road will allow him to meet both of these obligations.</p>	<p>See the Officer response to Comment ID 45 above in terms of the need for the secondary school and confirmation that Policy SA 24 seeks the protection of the playing fields.</p> <p>In terms of air pollution, the developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment. This will also need to address any potential impacts and/or significant effects in relation to air pollution. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies as well as the National Planning Policy Framework and national guidance.</p>	
137	224	Howard Potter	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>Background</p> <p>This site was the specific subject of a very intensive and prolonged consultation process from 2009 to 2010, instigated by the Local Authority prior to the Brewery closure. As a result a draft Planning Brief for the site was issued in 2010. I participated in the consultations sessions at the Sheen Lane Centre and engaged in discussion with</p>	<p>Secondary School - SA 24</p> <p>The summary statement for the Brewery site SA 24 now includes a change of proposal from primary school in the Adopted Brief to "an on-site new 6-form entry secondary school, plus sixth form". This is a major change with a completely different impact in respect of land take, scale, massing, traffic generation etc. and would indeed constitute a 'large scale destination use' - a use whole-heartedly</p>	<p>See Officer response to Comment ID 45 above.</p>

													<p>Council officers present and provided written comments. I have also made comments and observations on the draft as a member of the Mortlake Brewery Community Group,(MBCG), an umbrella group comprising members of the MESS, the MCA, the BCA and other local groups. The MBCG was formed to channel views for local residents and local associations, clubs etc.</p> <p>The outcome was the Adopted Supplementary Planning Document – Stag Brewery, Mortlake,SW14 – Planning Brief – adopted by the Council in July 2011. This remains the brief and guide to the site’s future re-development.</p> <p>During 2010 the Council also held parallel postal survey consultations to inform the process – “ All in One , Your Mortlake” and a borough-wide “ My Richmond Villages” , and one of the overwhelming aspects which the public raised was that; -“ open spaces were considered to be the most important aspect in making your area a good place to live” – (78%).</p>	<p>rejected by the community in the initial ‘Options’ stage of local consultations in 2008/2009/2010.</p> <p>The switch to a secondary school was proposed and agreed by Council Cabinet in late 2015 without due process of community engagement or consultation. This use combined with residential use and other commercial uses, included in the Brief and Publication Local Plan, would put quite unacceptable pressures on the site and its environs and local road network. This would also locate a school close to increased pollution levels on the local highways – Lower Richmond Road /Mortlake High St.</p> <p>The case for a secondary school specifically allocated for this site is by no means proven nor indeed justified. Cabinet’s decision in October 2015 was made without due consultation and indeed alternative solutions to satisfy secondary places/provisions have not been explored as far as the community is aware despite requests to the Council. The Council’s decision to provide a secondary school on the site appears to be more to do with opportunism rather than sound planning leaving the matter at least challengeable. My concern and thus objection to this proposal in the Publication Local Plan is that any secondary provision on the Stag site, in order to be of high quality, comparable with other secondary schools and to provide adequate external recreation/sports areas, will require a site area of circa 3 to 4.0Ha in total. This would occupy almost half of the 8.6Ha site and create a complete in-balance in relation to the broader vision for the site. It would also risk satisfying all of the other various agreed objectives for this unique site, which is a once in a life-time opportunity to create an exemplar development and put a village heart back into the Mortlake community.</p> <p>There may indeed be a need for additional “secondary provision in the area” and, indeed, in the medium term, but it does not automatically follow that the Stag site is the best site in strategic planning terms and particularly in financial terms. With regard to costs (although not strictly a planning matter) there is connection between the site value as established at its recent sale and guided by the development brief at the time and the viability of achieving an appropriate mixed housing scheme on the reduced balance of the site.</p> <p>The Stag Brewery land was purchased assuming the provision of the primary school and the Adopted Brief and will thus the developer will be keen to develop it based upon the original development strategy and density aspirations. These will now be in conflict with the Council’s other wider objectives for the site - (see Sections 1.1 to 1.6 of the</p>	
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Adopted Brief for the site).

I have been party to proposing an alternative location for a new secondary school on the Barn Elms site and this has been submitted to senior planning representatives at the invitation of the Council Members. I am of the view that a primary school would be appropriate on this Stag site, but do not agree with the draft as proposed. The Stag site offers a better primary school location than that proposed in SA. 27 – Barnes Hospital , which would suffer from very poor, restricted width, vehicular access on South Worple Way, and would be very close indeed to three other existing primary schools.(Barnes Primary, St Mary Magdalen’s and Thomson House).

Open Spaces - The Sports Fields - SA24

All previous consultation, and also the Adopted Planning Brief call for retention and indeed improvement of the existing open space on the western part of the Stag site. It is also proposed that new open space is created linking Mortlake Green to the riverside, helping to create the location for a Community Hub and heart to Mortlake.

- The sports fields have never been built upon and when attached to Cromwell House and were known as Cromwell Meadows
- They were used as allotments during WW2
- In 1966 they were used by the England football team for training and practice in preparation prior to winning the World Cup
- The sports fields have been consistently used by local clubs for many years
- The sports fields are designated as “Other Open Land of Townscape Importance” (DM OS3)
- The Adopted Planning Brief for the Stag site considered relocation of this space but the Council’s and the public’s conclusion was – “ that it must be retained in this location, and made more accessible for public use” – see Clause 2.43.
- See also E- Open Space- Clause 5.38 and (DM OS8) - These seek to protect the visual impact and character of the open land.

The Publication Local Plan now proposes the possibility of “re-provision” of the playing fields. This I object to most strongly as the definition of “re-provision” **is wide open to different interpretation in terms of size, location and timescale** . The bullet points in SA24 must include the retention of the existing sports fields and accord with the adopted brief and the long consultation process which led to agreement on retention of the sports fields in the present position - certainly NOT re-provision or re-distribution.It should be made crystal clear that Para 5.3.6 of Policy LP14 does not over-ride the adopted brief for the Stag site in this

particular respect.

Residential Development SA24 and LP34

The Adopted Planning Brief for the Stag site does not quote residential mix nor total numbers of units, only height, layout, bulk and massing limits. The Local Plan is silent on residential unit numbers in SA24.

I do support the total residential provisions in Section 9 housing Policy LP34, but would strongly object to any site density above the guidance in the GLA's Supplementary Guidance on Density (2016).

We have heard that the developer's emerging plans are proposing 850 apartments and 200 sheltered units – 1050 in total, plus residential units in upper floors of the Maltings building. This, combined with the secondary school would be a cumulative over-development even without the other mixed and employment uses included in the Adopted brief. Such over-development would compromise key objectives of the original brief and lead to local transport capacity overloads at and outside peak periods.

I support the limit to 400-500 units in the East Sheen, Mortlake, Barnes Common and Barnes area – LP34.

Bus Services Bullet point 11 - SA24

If the Avondale Rd bus stopping/turning facility was located on the Stag site it must involve the retention of the existing sports fields/open space. The more logical proposal, given the increase in population with the Stag site redevelopment would be 209 services extending beyond the Lower Richmond Road, preferably at least as far as the Manor Road bus terminus. Should the secondary school be located at a far more suitable site within Barn Elms, there is a case for extending the 22 bus route from its Putney terminus to say Manor Road via the Stag site. Such extended services would reduce local vehicular trips and alleviate traffic on the local network. This ought to be positively explored with TfL. The first sentence in bullet point 11 should therefore be removed, and the second sentence retained.

General SA 24.

- I would support the other aspects of the SA 24 proposals and bullet points.
- All aspects and Clauses of the Adopted Planning Brief for the Stag site should remain as currently adopted July 2011 - no clauses in the Local Plan should conflict or contradict with the Adopted Brief for the Stag Site.

96	96	Zachary Grimm	SA 24 Stag Brewery, Lower Richmond Road, Mortlake									It has been brought to my attention that the proposed construction of a secondary school on a portion of the above mentioned site has encountered opposition due its potential to limit access to the sports ground. I believe the current lack of quality secondary schools in the area leads to many families having to relocate when their children approach the end of primary school age and that a new secondary school would help stem that and lend continuity to the community. I therefore would like to voice my support for the development of a secondary school on the site.		Comments noted. Support welcomed.
139	23	Paulette Bates	SA 24 Stag Brewery, Lower Richmond Road, Mortlake	No	No	No	Yes	Yes	Yes	Yes	Yes	<p>Objects to Site Allocation. Reservations on the proposed plans</p> <p>Staff car park. Where are the teachers and staff of that school going to park??? There is NO room in the adjoining roads, as any available spare space not used by the residents is already taken up by the commuters using the local railway station. The only solution I can see is a multi-story car park in the school grounds, a more costly exercise, but the only feasible one in the long term. A school of the proposed size will no doubt, have some 50-60+ members of staff, and they need to be able to park their cars safely. Parking for parents when they drop off/pick up their children from school? Where is that going to go? Putting the main entrance to the school on the Lower Richmond [Road] is neither safe nor will it alleviate the already extremely heavy congestion at peak times, only make it a lot worse. The road is too narrow as it is.</p> <p>It is a shame that this green area has to be used as there is so little in Mortlake. The only other open space is the Mortlake Green near the station. <i>Removing the green playing fields will only add</i> to the general pollution.</p> <p>Is there a proposed plan for the school buildings and playing fields, or where are the children going for their games? Off site? Then they need a safe area to board the coaches and for the coaches to park up.</p> <p>Isn't there a preservation order on this field. is it in fact possible to build on it? And if there is, can the Council just overturn it?</p> <p>Residential Development in Mortlake</p> <p>Do the proposed houses have off street car parking, and if so for how many cars? One or two. In many families both parents work and frequently need two cars to get to and from work. Where do they park the second car? Are there</p>	<p>Amend as follows, (i) replacing references to the secondary school with a primary school of the type approved in the 2011 adopted supplementary planning brief for the site and (ii) removing the reference to the 'reprovision' of the playing fields.</p> <p>Suggested amended text 8.2.11 Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan: Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school</p> <p>13.1.7 13.1.7 A key challenge for the borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population. Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The local Plan identifies the following sites for educational uses: Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form of entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school</p>	<p>See Officer response to Comment ID 45 above.</p> <p>In relation to the specific comments on parking and construction impacts, the Council considers that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. In addition, the developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies, including the relevant transport and parking policies, as well as the National Planning Policy Framework and national guidance.</p> <p>It should also be noted that detailed discussions are taking place with the developers as part of the pre-application. In addition, detailed discussions and assessments of proposals, including on parking etc., will be taking place with the developers/applicants once a planning application has been submitted.</p>

										<p>surplus spaces. Will all on street parking become restricted to Residents Permits? If that's the case, where do the commuters park???</p> <p>Noise and traffic during construction state</p> <p>I am also very concerned about the noise and construction traffic during the construction phase. The dismantling/taking down process of the old brewery will result in a constant stream of lorries entering and leaving the site. The construction after that will do the same. How long is the process going to take, what are the planned steps to minimise disruption to the people already living here?</p> <p>I live at 6 Williams Lane, opposite the entrance to the brewery, so am very concerned about the noise, dust and dirt pollution that this project entails.</p>	<p>Barnes Hospital, Barnes: provision of 2-form of entry primary school</p> <p>SA 24 Stag Brewery, Lower Richmond Road, Mortlake The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 2-form entry primary school, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.</p> <ul style="list-style-type: none"> • The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities. • The brewery operations on this site have ceased at the end of 2015; the site has been marketed and sold. • There is a need to create a new village heart and centre for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities. • There is a clear need for a new primary school in this area. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school. • [Remaining text unchanged] <p>[A corresponding change should be made to the text on page 107 of the Sustainability Appraisal Report as it relates to SA24.]</p> <p>Table beneath SA 24 on page 107/108 of Sustainability Appraisal Report Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport) Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions) Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed)</p>
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the south west area of the site.”

The 4th bullet (DSA 24), however, re-iterates the need for the secondary school “as set out in the Council’s School Place Planning Strategy” and adds that “the Council expects any redevelopment proposal to allow for provision of this school.” I can understand the need for a new secondary school somewhere in the eastern part of the Borough (the current population in the state primary schools in this part being some 6,000 while the current population in the three state secondary schools is about 2,700). My concern, however, is that the provision of a new 6-form entry secondary school, plus sixth form – in order to be comparable with the other secondary schools – will require a site of about 4 ha including the existing sports fields, leaving only 4.6 ha for the housing development and new village centre for Mortlake (the total site area being 8.6 ha).

I am also concerned about the location of this secondary school. I have not seen the latest emerging plans and are wondering if the chosen location is alongside the Lower Richmond Road rather than on the site of the primary school shown in the development brief. Schools should not be located alongside heavily congested roads with high pollution levels.

Whilst I accept that the appropriate location for a new secondary school should be on the north side of the railway serving Barnes, Mortlake and Kew, which have no secondary school, I am of the opinion that there is an alternative location on this side of the railway worth exploring. I am also of the opinion that the Brewery site is more suitable for a primary school, rather than the site proposed at Barnes Hospital (SA 27) which has such poor access.

The Sports Fields

The development brief states (para 5.38) that “the existing sports recreation ground on the site is allocated as Other Open Space of Townscape Importance. Future proposals for the site will need to ensure that the development adjacent to the area of open land has regard to the visual impact on the character of the open land. The Council will seek the retention of the two existing football pitches/one cricket pitch for increased public use.”

I note, however, that the 10th bullet (SA 24) states: “links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provide the opportunity to integrate the development and new communities with the existing Mortlake community.” While I support this aim we are concerned that there is no further mention of the retention and/or reprovision of the playing field.

Barnes Hospital, Barnes: provision of 2-form of entry primary school

SA 24 Stag Brewery, Lower Richmond Road, Mortlake
The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 2-form entry primary school, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.

- The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site’s characteristics, constraints, land use and development opportunities.
- The brewery operations on this site have ceased at the end of 2015; the site has been marketed and sold.
- There is a need to create a new village heart and centre for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities.
- There is a clear need for a new primary school in this area. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.
- [Remaining text unchanged]

[A corresponding change should be made to the text on page 107 of the Sustainability Appraisal Report as it relates to SA24.]

Table beneath SA 24 on page 107/108 of Sustainability Appraisal Report

- Row 3 - travel - amend to make a double negative (the brewery has already ceased operations so there is no positive, and the combination of a new school, housing and businesses will have a material and negative impact on traffic and public transport)
- Row 4 - climate change mitigation - amend to make a double negative (the increased traffic referred to above will materially and negatively impact emissions)
- Row 6 - biodiversity - amend to add a negative (if any part of the playing field and/or trees are removed)

I have not yet seen the emerging plans but I am much concerned that, in order to allow more space for the housing development and village centre, these sports fields may be sacrificed and that re-provision may take the form of a single all-weather football pitch. Such re-provision would not be acceptable. These sports fields are a valuable local asset, they have never been built on and they were used as a training ground by the England football team before they won the World Cup in 1966.

The Housing Development

I have heard that the developer is proposing to provide some 850 apartments plus 200 sheltered units. We have also heard that the majority of the apartments will be 3- and 4-bedroom family units. The MBCG have calculated the density to be in the region of 420 habitable rooms per hectare. This is higher than the density of comparable recent developments on the Barnes and Kew Riversides and is similar to the density of the recently approved redevelopment of the Teddington Studios. It is also within the upper limit of 450 habitable rooms per hectare for development in an urban setting with limited public transport accessibility (as here) as given in the Greater London Authority's Supplementary Guidance on Density (2016).

However, part of the site has to be excluded from the calculations, namely the existing sports fields and the land required for the secondary school and village centre, and this could result in a significantly higher density (possibly twice as high). Such an increase in density would result in a significantly higher and more massive housing development which would reduce the quality of life for its residents and for the existing community.

It should be noted that according to the 2011 Census there are 4,771 households occupying 185 ha in the Mortlake/Barnes Common ward. The proposed 1,050 households (including 200 sheltered) should by the same token be occupying about 40 ha but will in practice be occupying nearly one tenth of that.

The increase in density will also have an adverse impact on traffic in Lower Richmond Road which is already congested in the peak hour due to constraints at the Chalkers Corner junction at one end and the Sheen Lane junction and railway level crossing at the other.

Overall Development

I am concerned that the emerging plans will show a serious overdevelopment of the site. I accept there is a need for more housing – in particular affordable housing – and for a secondary school but I am of the opinion that the two can not be provided together on the same site.

Row 7 - landscape and townscape - amend to add a negative (if large secondary school required)

Row 8 - parks and open spaces - amend to add a double negative (if any part of the playing fields are to be removed)

Row 12 - accessible local services - replace reference to 'secondary' with 'primary'

Summary of assessment to be updated accordingly, to include references to negative impact on environment and parks and open spaces and negative impact a large secondary school would have on availability of land for other uses

												MBCG have identified an alternative site for the school and have already made a separate submission to the Council in this regard.		
141	161	Derek Lonsdale	SA 24 Stag Brewery, Lower Richmond Road, Mortlake									<p>I feel it is objectionable to build on the playing fields that are a well used resource by the local area when there is a perfectly good location for a secondary school at Barnes Elms.</p> <p>Barnes Elms also has ample space for a school playing field and also sufficient space for parking.</p> <p>In addition, being a resident who lives directly on Thamesbank, I foresee litter being a problem. I collect litter TWICE a day (everyday) already from the grassed area running from Chiswick Bridge to Parliament Mews (I have a dog to walk!) . I can only envisage what the situation would be like with a 1000 place secondary school on the doorstep!</p> <p>I am very serious on this point as know what problems there are on Edensor Road in Chiswick due to the school – I was a resident there for some time and it is a continual concern for Hounslow Council.</p>	<p>The riverside and towpaths are wonderful areas that are visited and enjoyed by many – you feel it’s an ‘escape’ from the City. We need to protect it and keep it tidy not add to it’s pollution!</p>	<p>See the Officer response to Comment ID 45 above in terms of the consideration of alternative sites and confirmation that Policy SA 24 seeks the protection of the playing fields.</p> <p>In terms of litter, this is not a matter for the Local Plan.</p>
142	135	Alistair Johnston	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Page 186	No	No	No	Yes	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.</p> <p>I endorse the views expressed by Mortlake Brewery Community Group in its representations</p> <p>In addition, I would emphasise that the density of the proposed Brewery development is crazy... the Brewery site should be used for a Secondary School OR a housing development, not both... the traffic and transportation issues of both will cause a Perfect Storm of congestion and overcrowded public transportation in this already very busy part of the Borough...</p> <p>I would also like to take issue with the loss of the "Green Corridor" to the river which was a key component of the 2011 development plan... this would make a huge difference to the Mortlake area and it would be a tragedy if the one in a lifetime chance to create this great public amenity was lost...</p>	<p>Amend as follows, (i) replacing references to the secondary school with a primary school of the type approved in the 2011 adopted supplementary planning brief for the site and (ii) removing the reference to the 'reprovision' of the playing fields.</p> <p>Suggested amended text: SA 24 Stag Brewery, Lower Richmond Road, Mortlake The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 2-form entry primary school, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.</p> <ul style="list-style-type: none"> • The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site’s characteristics, constraints, land use and development opportunities. • The brewery operations on this site have ceased at the end 	<p>See Officer response to Comment ID 42 above.</p> <p>In addition, it should be noted that Other Open Land of Townscape Importance (OOLTI) has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. The OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances. However, it should be noted that any such reprovision would have to be on this site and not off-site or elsewhere in the Mortlake area.</p> <p>To avoid confusion and to add clarity, the</p>	

causing significant pollution for the homes nearby and frustration for those trying to travel. 1050 new residents all needing to travel each day is already going to create more difficulties. The addition of a school with parents dropping their children off at the same time will cause complete chaos and gridlock. It just won't work.

The train station is already very crowded in the mornings and I suspect will not be able to support many children from outside the area attending the school travelling in this way. More trains are not the solution as the barriers on Sheen Lane are already only open for about 18 minutes in the hour to allow cars to cross the rail tracks, and this causes some of the gridlock into Mortlake High Street mentioned above as cars are backed up to the mini roundabout. More trains will just make this situation worse.

There does not appear to be a useful way to resolve this situation. The level crossing is necessary to get to the south side of the tracks, so cannot be removed; the roads around the site cannot be widened in a meaningful way, due to housing on both sides; and the cost of tunnelling underneath the tracks I would imagine is extortionate, especially given the proximity to the river, and would cause significant inconvenience while it was being built. If you attend the site on any weekday in the school term you will be able to understand the problem.

In addition, Hammersmith Bridge is frequently closed for repairs, causing cars to divert past the site and adding additional pressure to the infrastructure.

For all of the above reasons, I believe that the proposed secondary school will provide insurmountable transport difficulties. I understand that there are several alternative and better sites at that are under consideration, and I think it would be much better to look at those sites than at the brewery.

I would also request that the number of dwellings available at the brewery site should be looked at again, in light of all the transport difficulties that they will engender.

sufficiently flexible, for example to take account of changing market conditions, as well as deliverable, and therefore they should not be too prescriptive. The scale, density and massing of the proposed uses and the potential impacts of the proposal, including on character, transport, and amenity, will be assessed as part of consideration of a planning application. In addition, the developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies, including the relevant transport policies, as well as the National Planning Policy Framework and national guidance.

101	61	Mel Dixon	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I am a local parent of three children two of whom are at Thomson House school. The other will go there when she turns four.</p> <p>I wholeheartedly support the application for a secondary school on the brewery site. Mortlake is in great need of a good secondary school. Many people I know leave the area because of the current lack of a decent secondary school which is a great shame and strips away at the community as well as being a huge upheaval to families.</p>	Comments noted. Support welcomed.
105	107	Rebecca Hastings	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I would like to lobby for the inclusion of a secondary school on the site, even with the expanded form entry at PRA and Christ's, there is still not sufficient places for secondary school children and with more housing this will only put more pressure. Primary places are not so key as extended form entry at East Sheen and Kew Riverside plus Darrel will all accommodate this.</p> <p>Initially there had also been plans for a cinema, shops and restaurants, can you confirm if this is still the case?</p> <p>Equally there will need to be careful consideration about traffic and congestion and equally more support for the revamp of sheen lane and the level crossing needs to be factored in</p>	Comments noted. Support welcomed. The scale, density and massing of the proposed uses and the potential impacts of the proposal, including on character, transport, and amenity, will be assessed as part of consideration of a planning application. No changes required.
108	130	Sandra Isaac	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I write to express my full support for the proposal to build a Secondary School on the Mortlake Brewery Site. It is an excellent opportunity to ensure we are providing much needed secondary school places in the area. As it stands the area has a number of Outstanding Primary Schools but there are insufficient, quality, secondary places forcing many parents to either move from the area or look at private school options. This is unacceptable as the council should be able to provide quality secondary places in the area. The Brewery site is an excellent option to provide a Secondary School and these opportunities don't come up very often - I'm sure it will be widely supported and we look forward to seeing how the Secondary School plans on the site take shape.</p>	Comments noted. Support welcomed.
68	126	David Hurst	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I very much support the development of a secondary school for the Mortlake brewery site. My children attend Thomson House school in Mortlake and there is a desperate need for a secondary school for all local children in SW14 to attend. Please support your local community and the future education needs of Mortlake.</p>	Comments noted. Support welcomed.

114	138	Timothy Kaye	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>Having viewed the local plan and its implications for the stage brewery development and associated Watney Playing fields, I strongly feel no development should compromise one inch of the playing fields themselves. They are more than a green space, they are a community asset for sport, which has a huge social and health value. And as to the idea of a secondary school on the site, I hope not. The traffic congestion would be uncontainable. Already this area is gridlocked morning and from 3 onwards as parents many in 4x4s pick up and drop off and ferry their kids to the next activity. It would be a travesty. The thinking behind this development as a whole should not be driven by thoughts of potential increased council tax revenues but what is best as whole for the community at a large. Yes that means new dwellings and some mixed use development, but helpfully created in a balanced and positive for the residents of today and tomorrow.</p>	<p>See the Officer response to Comment ID 45 above in terms of the consideration of alternative sites and confirmation that Policy SA 24 seeks the protection of the playing fields. In addition, the developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies, including the relevant transport policies, as well as the National Planning Policy Framework and national guidance.</p>
115	172	Francis McCormack	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>As a resident of <i>[address removed for confidentiality]</i>, in proximity to the proposed development, I wish to make plain my broad acceptance of the initial proposals of 2011 which saw a primary school adjacent to the playing fields and mixed height residential developments along the rest of the site (lower along the High Street for reduced impact), with a vista to the river plus other facilities.</p> <p>I now understand a large academy building with loss of the fields is now proposed (without explanation or consultation) and higher, more densely - packed buildings elsewhere to reach the developer's target number of units.</p> <p>I wish to object to the changed proposals for 3 reasons:</p> <ul style="list-style-type: none"> a) the loss of the existing open space b) the increased density of the new proposals, much higher than GLA norms or recent developments in the Borough (e.g. Teddington Studios), with likely loss of the originally proposed river view c) the inevitable rise in traffic and pressure on public transport (train, bus) to service residents of the site and school users who will inevitably have to travel in from beyond the immediate area - the latter would be better catered for in a part of Barn Elms 	<p>I would urge the Council and developer to come up with something corresponding more to the original plan as the new proposals will be detrimental to our everyday life here in Mortlake.</p> <p>Comments noted. The Local Plan and its policy do not propose building on the playing field, which is designated as Other Open Land of Townscape Importance (OOLTI). OOLTI has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. It is acknowledged that the OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances. However, it should be noted that any such re-provision would have to be on this site and not off-site or elsewhere in the Mortlake area. To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "Links through the site, including a new green space and high quality public realm link</p>

116	89	Mary Gillingham	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I am a resident of East Sheen and am interested in the proposals to develop the Mortlake Brewery site.</p> <p>I appreciate that there are a number of interested parties and considerations, some of which will be in conflict with one another. I know that there is a need for increased school provision at both primary and secondary levels in this part of the borough; developers will be interested in the number and size of new housing units they can build on the site, as their profits will be affected by that and that there are commercial, employment, transport and aesthetic impacts which need consideration.</p> <p>In the light of all these and others, I can see that it might be tempting to move away from the original proposal in the 2011 Development Brief which stated (para 5.38) that "the existing sports recreation ground on the site is allocated as Other Open Space of Townscape Importance. Future proposals for the site will need to ensure that the development adjacent to the area of open land has regard to the visual impact on the character of the open land. The Council will seek the retention of the two existing football pitches/one cricket pitch for increased public use." The retention and development of the open space is important. The reference in the current plan to potential "reprovision" seems to suggest that the original intention may have changed and that the retention and upgrading of the green open spaces may no longer be a priority.</p>	<p>I would support:</p> <ul style="list-style-type: none"> • holding to the retention and improvement of the existing sports fields, as outlined in the 2011 Development Brief, as one of the priorities for the site • the provision of a 2 form entry primary school as being more in keeping with the overall size of the site for development, than a 6 form entry secondary school with sixth form • the provision of new housing units with a strong emphasis on affordable and social housing • the density of the new proposed housing units (including sheltered units) should be roughly in proportion to the existing housing density in the locality, which I understand is around 4771 households occupying 185 hectares. 	<p>See the Officer response to Comment ID 45 above.</p>
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117	256	R Sherwood & S Sainty	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>In response to the Borough's Local Plan publication for consultation, we would like to express some concerns over the proposed Stag Brewery redevelopment plan.</p> <p>The plan incorporates a 1000 pupil secondary school. A secondary school of this size seems highly likely to impact the existing sports field. There is mention of a possible re-provision of the field, but no details of what this might entail. The sports field is an important local facility; if it was eliminated or reduced in size to accommodate a new school this would have a detrimental impact on the local community, as well as meaning a loss of green space in the area.</p> <p>We are aware that the council has been informed of some potential alternative sites for a secondary school in the area that would provide more space and better facilities for this number of students, and we hope the council will give these sites consideration instead.</p> <p>We are also concerned that the plan incorporates a large number of housing units, but as the developers' plans have not yet been exhibited it is unclear what proportion of the site has been earmarked as housing. We are concerned that the number of units proposed might represent a serious overdevelopment of the site.</p> <p>The combination of the housing units and the school will also represent a huge increase in traffic in the local area, both road traffic and commuters using Mortlake rail station. There is little in the plan suggesting what the council anticipates this impact to be, and how it plans to address it.</p>	See the Officer response to Comment ID 45 above.
99	44	Jen Causton	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I am in support of the proposal for the secondary school at the Old Brewery in Mortlake.</p> <ul style="list-style-type: none"> - The area is devoid of free secondary schools. - There is a disconnect in quality between this area's excellent primary schools and the free secondary schools: a new school may offer chance to address the balance. For example, Richmond Park Academy is still struggling. - I appreciate that the Mortlake Brewery Community Group is concerned about the loss of the playing field but surely a new school would offer some compromise, thus I believe it should be given priority over this and would be a direct contribution to their strapline "Help save the heart of Mortlake." - The area is in desperate need of regenerating! Whilst it seems that every scrap of land in south west London is being used for residential, the size of this area lends itself to diversifying away from state of the art, highly priced 	Comments noted. Support welcomed.

										apartments and something more community-orientated.	
120	156	Mary-Louise Le Vesconte	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I am concerned that the Stag Brewery development in Mortlake is going to be overdeveloped. Mortlake is a narrow strip between the river and the railway and is already prone to traffic congestion and pollution, particularly where engines idol at the already busy level crossing – causing health concerns. I look forward to the re-development of the site but hope it is done in a way that will enhance rather than spoil the quality of life in the area.</p> <p>Maintaining the green space is important for both physical and mental health and I am concerned that the original agreement to keep the playing fields and create a throughway from the Green to the river has been changed.</p> <p>The need for another school in the area is acknowledged but I do not feel that this site would be appropriate. There is not enough space to accommodate proper facilities for pupils as well as the planned number of dwellings, which has been increased from the original specification, and the necessary inclusion of adequate social housing and a community centre. Siting the school somewhere else - like Barn Elms - where there is plenty of space and better transport links for the pupils, in my opinion would seem more appropriate.</p> <p>Mortlake has a rich heritage which needs to be fostered, and the ‘heart’ of this historic part of London retained in a sensitive way. I truly hope that the planners will be keeping this in mind so as to make this development a pleasing place for all.</p>	See the Officer response to Comment ID 45 above in terms of the consideration of alternative sites and confirmation that Policy SA 24 seeks the protection of the playing fields.

122	294	Sarah & Mike Turnbull	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>My family live in the local area and are very interested to learn of the plans for the brewery.</p> <p>When we first heard that a secondary school maybe being built, we were excited as we presently have a child at primary in the area. With a lack of state school options this is of great interest. Our concerns are the mention of the school being built on the playing fields rather than the brewery site. In our opinion all children require green areas for play, whether that be a run around at break time, school games lessons or competitive inter school games. The loss of this area would be detrimental.</p>	<p>Please do continue to think about a secondary school, but whichever site is decided upon, please ensure there is ample outdoor area to encourage healthy exercise.</p> <p>Other areas of concern are the increase of housing, the railway crossing on Sheen Lane cannot cope already with the traffic expectation let alone with a huge increase in pressure. Please consider this decision carefully and research thoroughly the present pressure on the Lower Richmond Road from Kew, Mortlake High Street and Sheen Lane.</p>	<p>Comments noted. The Local Plan seeks the protection of the playing fields, which are designated as Other Open Land of Townscape Importance (OOLTI). OOLTI has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. It is acknowledged that the OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances. However, it should be noted that any such re-provision would have to be on this site and not off-site or elsewhere in the Mortlake area.</p> <p>To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. <u><i>This includes the retention and/or re-provision and upgrading of the playing field within the site.</i></u>"</p>
104	74	Renata Fairbanks	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I am a mother living in Mortlake and I would like to say that I strongly support the development of the Brewery site as a secondary school. We have a couple primary schools pretty much at hand, but no secondary school nearby, what cause a big distress for parents. I completely disagree with the idea that a village town would be more suitable than a school - that would mean a lot more traffic and, really, we're talking shopping versus education. I can't really see how one could prefer the former. I really appreciate having the opportunity to express my views.</p>		<p>Comments noted. Support welcomed.</p>

126	257	Mr & Mrs Skipper	SA 24 Stag Brewery, Lower Richmond Road, Mortlake								We would like to object in the strongest possible terms to the latest proposal for the Brewery site. We understood that a Primary school was proposed for the site which was acceptable however a six form entry secondary school for this site is totally unacceptable. This would add to the pollution and congestion in an already congested area. The loss of a green area is also a disgrace. The council and the developers have the chance to build something of quality which would enhance the area and the riverside. We were looking forward to a development that would improve the area not destroy it.	See the Officer response to Comment ID 45 above.
127	310	George Young	SA 24 Stag Brewery, Lower Richmond Road, Mortlake								As a local father, I fully support the plans to build a secondary school on the brewery site.	Comments noted. Support welcomed.
128	27	Hilary Beedham	SA 24 Stag Brewery, Lower Richmond Road, Mortlake								<p>My comments are as follows :</p> <ol style="list-style-type: none"> 1. the traffic situation is already unsustainable. There is simply not enough road space to cope with an additional number of dwelling units and the secondary school on top of the current traffic levels. Please remember that this space is locked between the level crossings and the river (and rumour has it that Heathrow is going to run extra trains down this line from Waterloo to serve it's latest runway capacity). Is tunnelling or bridging being proposed?? Please confirm that this risk is being considered together with the other risks. Please ensure that the Councillors come down here and see for themselves the problems (they are based much too far away with no similar risks). 2. 1000 dwelling units is much too many. Have you checked whether the sewers and the electricity grids can cope? I am not against a reasonable number of dwelling units on the site (maybe as many as 600) but 1000 is cloud cuckoo land. Please detail the arrangements for parking or will this be a no car zone as they are easy walking distance to the station and also the bus (if TfL moves the stand.) 3. The primary school I could almost understand (albeit next door to Thompson House) but a 1,000 pupil plus staff secondary school – how and why?? Can we not partner with Hounslow or Hammersmith as there is heaps of open space on the north bank of the river just across Chiswick Bridge and very little on the southbank. I don't believe that this school is either practical nor achievable within the local community infrastructure. Also the potential loss of the sports ground will only lead to a rebellion here. You have been warned. <p>I am very disappointed in my councillors for not putting</p>	See the Officer response to Comment ID 45 above.

										pressure on to come up with a more reasonable solution to this. The people of Mortlake have agreed to work positively for the development of this site – but we can turn rapidly if unreasonable solutions are being put forward. I have lived here for 30 years and suspect that those working on this plan are either remote from the site or cannot possibly know the area to be considering such crazy ideas.	
119	104	Mr & Mrs Harrington	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>We are Mortlake residents and we wish to register our <u>concerns</u> about the proposed redevelopment of the Mortlake Brewery site as we understand it from the Mortlake Brewery Community Group.</p> <p>The plans seem to have changed from the original proposal:</p> <ol style="list-style-type: none"> 1) Now a larger secondary school NOT a primary school 2) The increase in the overall scale of the development 3) The threat of the green space playing field being built on! <p>All the above will have a negative impact on the roads, pollution and infrastructure of the area.</p> <p>We feel it is crucial that you <u>listen to the residents</u> who will be hugely effected if the redevelopment is not handled with care.</p> <p>We feel there is not a great level of communication between yourselves and the local residents.</p>	See the Officer response to Comment ID 45 above.
144	15	Tim Barker	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I object to a new school here especially a new secondary one with hundred of pupils The road system is fully choked and a new school here will not work as pupils will not be able to get to school - the congestion is too bad as is!</p> <p>I appreciate the need for more schools but suggest there will be better locations in the Borough than this part of Mortlake</p>	See the Officer response to Comment ID 45 above.
146	6	Susannah Amore	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I wish to underline my dismay at your apparent insistence that a 1,000-pupil secondary school, rather than a primary school, is to be included in the Mortlake Brewery Development, and that it could lead to the loss of the treasured Brewery sports field as that would be engulfed by buildings and tarmac.</p> <p>You will recall that local residents were reasonably content with your 2011 planning proposal for the site. It seemed that you recognised how important it was to do everything possible to protect the heart of what is left of historic Mortlake. And the discreet new housing development at one side of the playing field, which has fitted in seamlessly, appeared to bear this out.</p>	See the Officer response to Comment ID 45 above.

											<p>This explains why I am shocked that your commitment to building a vast secondary school within the development could lead to the loss of the important sports field. The destruction of the Brewery site gives you the perfect opportunity to even enhance Mortlake with thoughtful and considerate planning, but it seems you could destroy forever the essence of Mortlake, its quaint singularity, by changing your 2011 development plan to include an enormous secondary school and yet more housing.</p> <p>As is so often the case, the Brewery field was full of children playing school or club football last weekend, and they need to continue to play there. Local residents too are desperate for this green space to be protected from development, as just two areas are left to enjoy and lift spirits - the sports field and Mortlake Green - with their simple grass, trees and birds.</p> <p>As professional Planners and Councillors, you will have studied the entire site in minute detail, and must accept that the Brewery development as a whole will give rise to an overwhelming and intolerable increase in traffic and pollution on Mortlake's cramped roads.</p> <p>No amount of tinkering at Chalker's corner can resolve this issue, as it will arise from the development's infinitely greater density of housing and associated buildings than exist at present in Mortlake; the level crossing being closed for approximately 45 minutes per hour in day time; the relatively cramped and already busy Mortlake roads; the narrow thoroughfare of Barnes to be squeezed through at the bridge; and the inability to rely upon the structure of Hammersmith Bridge until completely re-built.</p> <p>You must also accept that Mortlake is hardly an ideal site for a 1,000-pupil secondary school, as it is bound to be limited in open space around the buildings. There has to be a suitable site found elsewhere in the borough with far more space to allow such a large school to flourish.</p> <p>I do hope you are listening to our views on this issue, this development, and that local residents are not left feeling powerless, our voices unheard, as we shall have to endure and live with the consequences of the far-reaching decisions should they prove misguided.</p>		
176	291	Kwun Teng Tsang	SA 24 Stag Brewery, Lower Richmond Road, Mortlake	No	No	No		Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the extent legal compliance (box 4.(1)) and/ or the</p>	<p>Amend as follows, (i) replacing references to the secondary school with a primary school of the type approved in the 2011 adopted supplementary planning brief for the site and (ii) removing the reference to the 'reprovision' of the playing</p>	<p>See Officer response to Comment ID 45 above.</p>

duty to co-operate (box 4.(3)) apply, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.

Throughout the rest of this document MBCG refers to the Mortlake Brewery Community Group, <http://www.mbcg.org.uk>

SA 24 Policy Statement

It is noted that the policy statement mentions: "The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required. Appropriate uses, in addition to educational, include sport and leisure uses including the retention and/or reprovision and upgrading of the playing field. The Council will expect the provision of high quality open spaces.... as well as a new publicly accessible green space link to the riverside."

The statement is followed by supporting text in 12 bullets. I have no argument with nine of these bullets but have comments on the 1st, 4th and 10th bullets as follows:

Development Brief

The 1st bullet states that "the Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities." My concern is about a disconnect between the policy statement and the development brief with regard to the 4th and 10th bullets below.

The Secondary School

The development brief clearly states (para 5.20) that "the Council will support the provision of a two- form entry Primary School" and that "the preferred location for any school facilities is adjacent to the existing sports fields in the south west area of the site."

The 4th bullet (DSA 24), however, re-iterates the need for the secondary school "as set out in the Council's School Place Planning Strategy" and adds that "the Council expects any redevelopment proposal to allow for provision of this school."

I can understand the need for a new secondary school somewhere in the eastern part of the Borough (the current population in the state primary schools in this part being some 6,000 while the current population in the three state secondary schools is about 2,700). My concern, however, is that the provision of a new 6-form entry secondary school, plus sixth form – in order to be comparable with the other secondary schools – will require a site of about 4 ha including the existing sports

fields.

Suggested amended text 8.2.11

Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan:

Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college

Stag Brewery, Mortlake: provision of a new 2-form of entry primary school

Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school

13.1.7

13.1.7 A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population.

Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses:

Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college

Stag Brewery, Mortlake: provision of a new 2-form of entry primary school

Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school

SA 24 Stag Brewery, Lower Richmond Road, Mortlake

The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 2-form entry primary school, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area

fields, leaving only 4.6 ha for the housing development and new village centre for Mortlake (the total site area being 8.6 ha).

I am also concerned about the location of this secondary school. I have not seen the latest emerging plans and am wondering if the chosen location is alongside the Lower Richmond Road rather than on the site of the primary school shown in the development brief. Schools should not be located alongside heavily congested roads with high pollution levels.

Whilst I accept that the appropriate location for a new secondary school should be on the north side of the railway serving Barnes, Mortlake and Kew, which have no secondary school, I am of the opinion that there is an alternative location on this side of the railway worth exploring. I am also of the opinion that the Brewery site is more suitable for a primary school, rather than the site proposed at Barnes Hospital (SA 27) which has such poor access.

The Sports Fields

The development brief states (para 5.38) that “the existing sports recreation ground on the site is allocated as Other Open Space of Townscape Importance. Future proposals for the site will need to ensure that the development adjacent to the area of open land has regard to the visual impact on the character of the open land. The Council will seek the retention of the two existing football pitches/one cricket pitch for increased public use.”

I note, however, that the 10th bullet (SA 24) states: “links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provide the opportunity to integrate the development and new communities with the existing Mortlake community.” While I support this aim we are concerned that there is no further mention of the retention and/or re-provision of the playing field. I have not yet seen the emerging plans but I am much concerned that, in order to allow more space for the housing development and village centre, these sports fields may be sacrificed and that re-provision may take the form of a single all-weather football pitch. Such re-provision would not be acceptable. These sports fields are a valuable local asset, they have never been built on and they were used as a training ground by the England football team before they won the World Cup in 1966.

The Housing Development

I have heard that the developer is proposing to provide some 850 apartments plus 200 sheltered units. We have also heard that the majority of the apartments will be 3-

as well as a new publicly accessible green space link to the riverside.

[A corresponding change should be made to the text on page 107 of the Sustainability Appraisal Report as it relates to SA24.]

- The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site’s characteristics, constraints, land use and development opportunities.
- The brewery operations on this site have ceased at the end of 2015; the site has been marketed and sold.
- There is a need to create a new village heart and centre for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities.
- There is a clear need for a new primary school in this area. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.
- [Remaining text unchanged]

and 4-bedroom family units. The MBCG have calculated the density to be in the region of 420 habitable rooms per hectare. This is higher than the density of comparable recent developments on the Barnes and Kew Riversides and is similar to the density of the recently approved redevelopment of the Teddington Studios. It is also within the upper limit of 450 habitable rooms per hectare for development in an urban setting with limited public transport accessibility (as here) as given in the Greater London Authority's Supplementary Guidance on Density (2016).

However, part of the site has to be excluded from the calculations, namely the existing sports fields and the land required for the secondary school and village centre, and this could result in a significantly higher density (possibly twice as high). Such an increase in density would result in a significantly higher and more massive housing development which would reduce the quality of life for its residents and for the existing community.

It should be noted that according to the 2011 Census there are 4,771 households occupying 185 ha in the Mortlake/Barnes Common ward. The proposed 1,050 households (including 200 sheltered) should by the same token be occupying about 40 ha but will in practice be occupying nearly one tenth of that.

The increase in density will also have an adverse impact on traffic in Lower Richmond Road which is already congested in the peak hour due to constraints at the Chalkers Corner junction at one end and the Sheen Lane junction and railway level crossing at the other.

Overall Development

I am concerned that the emerging plans will show a serious overdevelopment of the site. I accept there is a need for more housing – in particular affordable housing – and for a secondary school but I am of the opinion that the two can not be provided together on the same site. MBCG have identified an alternative site for the school and have already made a separate submission to the Council in this regard.

N.B As a resident who only moved in a few years ago I'm frankly appalled and alarmed at the lack of clarity and thinking about housing a secondary school at the development and the resulting implications from a population density point of view that might emerge from this. This is a once in a life time opportunity to re-develop a key part of London's riverside community so every ounce of care and effort must be spared to ensure the view of the residents most impacted by this are taking into account

147	20	R Bashliev	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I am writing to express my strong objection to the recent proposal for the redevelopment of the Mortlake Brewery site to include a 1000 pupil secondary school. This is a significant change from the original proposal that was approved in 2011.</p> <p>My main concern with this new proposal is transport. During peak hours the traffic in the area around the brewery is already backed up into Mortlake High Street, causing significant pollution for the homes nearby and frustration for those trying to travel. 1000 new residents all needing to travel each day is already going to create more difficulties. The addition of a school with parents dropping their children off at the same time will cause complete chaos and gridlock. It just won't work.</p> <p>The train station is already very crowded in the mornings and I suspect will not be able to support many children from outside the area attending the school travelling in this way. More trains are not the solution as the barriers on Sheen Lane are already only open for about 18 minutes in the hour to allow cars to cross the rail tracks, and this causes some of the gridlock into Mortlake High Street mentioned above as cars are backed up to the mini roundabout. More trains will just make this situation worse.</p> <p>There does not appear to be a useful way to resolve this situation. The level crossing is necessary to get to the south side of the tracks, so cannot be removed; the roads around the site cannot be widened in a meaningful way, due to housing on both sides; and the cost of tunnelling underneath the tracks I would imagine is extortionate, especially given the proximity to the river, and would cause significant inconvenience while it was being built. If you attend the site on any weekday in the school term you will be able to understand the problem.</p> <p>In addition, Hammersmith Bridge is frequently closed for repairs, causing cars to divert past the site and adding additional pressure to the infrastructure.</p> <p>For all of the above reasons, I believe that the proposed secondary school will provide insurmountable transport difficulties.</p>	<p>I understand that there are several alternative and better sites at that are under consideration, and I think it would be much better to look at those sites than at the brewery.</p> <p>I would also request that the number of dwellings available at the brewery site should be looked at again, in light of all the transport difficulties that they will engender.</p>	<p>In relation to an assessment of alternative sites, please see the Officer response to Comment ID 42 above.</p> <p>The Council considers that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. Policies need to be sufficiently flexible, for example to take account of changing market conditions, as well as deliverable, and therefore they should not be too prescriptive. The scale, density and massing of the proposed uses and the potential impacts of the proposal, including on character, transport, and amenity, will be assessed as part of consideration of a planning application. In addition, the developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies, including the relevant transport policies, as well as the National Planning Policy Framework and national guidance.</p>
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134	124	Jonathan, Sarah & Alex Hughes	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I am writing to object to your plans to build a secondary school for a thousand pupils on the playing field and surrounding areas on the old Watneys Brewery land in Mortlake for the following reasons:</p> <ol style="list-style-type: none"> 1. The infrastructure could not cope with this extra car and foot traffic 2. The playing field is currently used extensively by local sports clubs & schools in the area 3. There are three perfectly adequate secondary schools close by in the surrounding area (Chiswick, Christs and Sheen Academy) 4. A school of this size would need a large car parking area - cars would add even more harmful fumes to what is already a 'high emissions' area. 	See Officer response to Comment ID 45 above.
148	120	Peter Hope	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>Whilst I appreciate the significance and opportunity that this offers to the Borough, there are 3 areas that concern me:</p> <ul style="list-style-type: none"> • The proposed change in building a new secondary school in lieu of a primary school – what is the basis for this decision? Where is the evidence that the Borough needs one? • It appears that the current playing fields on the will be lost as a result. What is the justification for losing these amenities at a time when such facilities are dwindling throughout the Capital? • How will the current road network respond to the sizeable amount of additional vehicular traffic that will result from the development of the Brewery Site? Mortlake High Street, the road to Chalkers Corner and Sheen Lane are regularly at virtual standstills coping with existing traffic flows. The inordinate length of time the barriers are down at the road/ rail junction at Mortlake Station is bad enough now with long tailbacks either way. Additional traffic will worsen this. Pollution will increase and air quality deteriorate. What are the mitigation measures under consideration? 	See Officer response to Comment ID 45 above.

149	173	Mike McCutcheon	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I'd like to comment on your changed plans for the Mortlake Brewery site, including building on the playing fields.</p> <p>I'm known to be a pretty relaxed person but in summary, I am absolutely livid that you are intending to do this.</p> <p>There should actually be no development at all</p> <p>I actually think that the site should be returned to green fields as it was before the brewery was built:</p> <ol style="list-style-type: none"> 1. There is no moral basis for the brewery making a financial killing from developing their site to the detriment of the community. 2. Mortlake is already a very difficult place to get out of by car or bus most of the day on weekdays and at weekends. Traffic is often backed up along Mortlake High Street as far east as White Hart Lane and then back onto the Terrace. <p>The traffic is particularly bad because of Mortlake's topography: a long, densely-populated rectangle jammed between the railway and the Thames, lying on the route between the south-of-the-river towns like Putney and the western motorways (M3 and M4). Have you ever considered and realised that there are only 4 places for cars and buses to enter and leave Mortlake:</p> <ul style="list-style-type: none"> - Mortlake High Street - White Hart Lane level crossing - Sheen Lane level crossing - Chalkers Corner. <p>Chalkers Corner has been made worse in the last 10 years because you allowed the Highways Agency (?) to mess around with the phasing of the traffic lights - presumably to speed up through traffic on the A316 (?) to the detriment of local traffic.</p> <p>Have you ever done a traffic survey to assess these existing problems ? I very much doubt it. Shame on you if you haven't and don't.</p> <p>You are about to make the existing problem even worse by "enhancing" the crossroads on Barnes Common and therefore encouraging even more traffic to come across the common, through Barnes and onto Mortlake High Street on its way to Chalkers Corner.</p> <p>The whole situation is obviously made even worse by the frequent and prolonged closures of Hammersmith Bridge;</p>	<p>Legacy</p> <p>Presumably almost all of you became councillors and executives partly / mainly to have a beneficial impact on the community, for which I salute you. This is a big opportunity for you to be brave, put your foot down, throw down obstacles in front of any of your colleagues who might be doing this for financial gain and:</p> <ul style="list-style-type: none"> - vote down any expansion - allow only minor development, including changes to road layouts (eg a west-going bus lane) and the waterfront - create an area which you will be proud of for the rest of your lives when you pass it with your children and grandchildren. 	<p>See Officer response to Comment ID 45 above.</p> <p>The national policy as set out in the National Planning Policy Framework encourages the effective use of land by reusing land that has been previously developed (brownfield land). The Stag Brewery site is clearly a previously developed site that is now redundant and therefore it is neither a viable, nor deliverable or desirable option to return it to its status before it was a brewery.</p>
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									<p>please don't argue that these closures are once-off and should therefore be ignored.</p> <p>There certainly should not be any expansion of this already objectionable plan, which presumably was "agreed" a few years ago.</p> <p>Now you plan to make the original wretched plan even worse:</p> <ol style="list-style-type: none"> 1. Even more traffic. 2. The scandalous elimination of the precious playing fields. Do / did none of you even play sport and understand the massive benefits that team sports in particular bring to communities ? Do none of you read the acres of newsprint reporting and discussing the problems brought on by youths in the communities losing their playing fields and losing the ability to play sport ? Do you not listen to similar reports and discussions on the radio and television ? <p>Why is this being done ?</p> <ol style="list-style-type: none"> 1. For financial gain for a few corrupt councillors and planners ? Let's hope not, although that's what people around here inevitably assume. 2. Because you are allowing central government to bully you into "doing your bit" to concrete, tarmac and block up the nicer parts of London ? 	
153	165	Carrie Manly	SA 24 Stag Brewery, Lower Richmond Road, Mortlake						<p>I think there should be a secondary school on the Mortlake brewery site do to the excess volume of children generated from the new houses that are being build on the site and also the abundance of children in the area already that will require a secondary school in years to come</p>	Comments noted. Support welcomed.

159	106	Margaret Harrop	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>The development at this site will affect the whole area. There is exciting potential, but also the risk that over-development might have an adverse effect both on the site itself and on the surrounding areas. In particular I would stress the importance of</p> <ul style="list-style-type: none"> • managing the traffic flows • preserving the open spaces • avoiding very dense development, and leaving space for the community centre. <p>I note the local plan has changed to allow for the building of a very large secondary school on the site. This would inevitably take a lot of space and generate traffic and could all too easily become the dominant feature of the whole site. While I fully accept the importance of secondary education in this area, there are other possible sites, and possibly alternatives to building a single huge new school. The options need to be properly assessed, and the public consulted about them, before a decision on this is taken. So at this stage I would oppose this revised local plan</p>		See the Officer response to Comment ID 45 above.
125	231	Mr & Mrs Keith Rankin	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I wish to register our strong objections to the proposed developments on the Brewery and playing fields site. The proposal for high density housing plus a large secondary school is madness. The traffic along Sheen Lane and Mortlake High Street heading for Chalker's Corner is already a consistent bottleneck, often resulting in gridlock. Traffic planners must know this already. There is no alternative way for the new residents, plus the inevitable school run, to access the new developments, so the gridlocks will become longer and even more frequent. Furthermore, the playing fields are a valuable local community asset, supporting physical activities (football, etc) as well as 'village' fetes. It would be a betrayal by the council to give up this facility to developers.</p>	The development plans should be scaled down significantly if the results are to be an asset rather than a blight on the whole area.	See the Officer response to Comment ID 45 above.

161	281	Stephen & Margaret Tester	SA 24 Stag Brewery, Lower Richmond Road, Mortlake Page 186	No	No	No	Yes	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.</p> <p>My wife, Margaret Tester, who lives with me at the above address, endorse the views expressed by Mortlake Brewery Community Group in its representation(s).] We feel particularly strongly that the proposed secondary school is too small for the site, and that any decision to build it in this location would be misguided, given the availability of ample land at Barn Elms for such a development.</p> <p>The introduction of a 1000 pupil school, accessed from the already congested Lower Richmond Road, coupled with a 1000 unit residential estate is going to create huge traffic problems which are not alleviated in any significant way by the current proposals. The end result will be a heighthened level of pollution, an enhanced risk of asthma and similar problems and an overall reduction in the quality of life in the area.</p>	<p>Amend as follows, (i) replacing references to the secondary school with a primary school of the type approved in the 2011 adopted supplementary planning brief for the site and (ii) removing the reference to the 'reprovision' of the playing fields.</p> <p>Suggested amended text:</p> <p>SA 24 Stag Brewery, Lower Richmond Road, Mortlake The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 2-form entry primary school, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.</p> <ul style="list-style-type: none"> • The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities. • The brewery operations on this site have ceased at the end of 2015; the site has been marketed and sold. • There is a need to create a new village heart and centre for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities. • There is a clear need for a new primary school in this area. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school. • [Remaining text unchanged] <p>[A corresponding change should be made to the text on page 107 of the Sustainability Appraisal Report as it relates to SA24.]</p>	<p>See Officer response to Comment ID 42 above.</p> <p>In addition, it should be noted that Other Open Land of Townscape Importance (OOLTI) has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. The OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances. However, it should be noted that any such reprovision would have to be on this site and not off-site or elsewhere in the Mortlake area.</p> <p>To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. <u><i>This includes the retention and/or reprovision and upgrading of the playing field within the site.</i></u>"</p> <p>It is considered that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. Policies need to be sufficiently flexible, for example to take account of changing market conditions, as well as deliverable, and therefore they should not be too</p>
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this, alternative locations in the area were considered."

The SPPS document shows that the three existing secondary schools on the Surrey side of the river had admission year capacities in 2014 as follows: Richmond Park Academy (RPA) 180, Christ's 150 and Grey Court 210, making a total 18-form entry of 540 places. It shows the admission year capacities of the primary schools on the Surrey side of the river as a total 29-form entry but not in numbers (the size of forms can indeed vary). It concludes that there is a need for a new school in the area but our comments are as follows:

- We understand from discussions with the Council's education service (Achieving for Children) that there are some 400-550 pupils who will be leaving primary schools in the area around RPA and Christ's 8th year (2017) in search of only 205 places available in these two secondary schools, vis. 130 at RPA (because 50 places are usually for Wandsworth pupils) and 75 at Christ's (because the other 75 are for C of E pupils).

- We have contacted these two schools and learnt that RPA's admission capacity is actually 210 (not 180) and that Christ's admission capacity is over 75 because there are never enough C of E pupils to fill the other 75 places.

- We note that the Richmond upon Thames College School, which will open in Sept 2017, is just to the west of Twickenham Bridge and close enough to the Surrey side to be within the catchment of that side of the river; and that the admission capacity will be 150. Admittedly much of this capacity will be taken up by pupils on the Middlesex side but another new school on the Middlesex side, Turing House, will likewise have an admission capacity of 150 when it moves to Whitton in 2018.

- We note that a secondary school in Chiswick (Hounslow) and two in Putney (Wandsworth) are also within the catchment of the Surrey side and that recent improvements in these schools could attract pupils back to those boroughs releasing places for pupils resident in the borough of Richmond.

- We note that both RPA and Christ's have playing fields within their boundaries and both also make use of the playing fields on Palewell Common. Christ's has an extensive area of playing fields and it should be possible to further expand this school in situ.

- We are aware that there is a significant percentage of

would be unable to meet its statutory duty to provide places for those children. It is forecast that the children who are at most risk of not being admitted to any of the three schools in the eastern half of the borough live in Kew, and east and north Barnes. The updated School Place Planning Strategy (2015) therefore identifies the Stag Brewery site for a six-form entry secondary school, which would grow year-group by year-group over seven years. There would be 900 pupils in total across Years 7-11, with an eventual sixth form of 250.

It should be noted that a number of alternative sites for a secondary school were considered. The assessment of alternative sites included (1) Barn Elms Playing Fields, Barnes, (2) London Welsh RFC Ground, Old Deer Park, Richmond, (3) London Scottish & Richmond RFC Grounds, Richmond Athletic Ground, Richmond and (4) Pools on the Park, Old Deer Park, Richmond. However, all alternative sites have been discounted for a number of reasons, particularly as the majority would have required built development in land designated as MOL, and all the alternative sites are widely used and popular multi-sports use sites in the borough.

In terms of the location of the proposed secondary school, this will be discussed with the developer as part of the planning application process. The starting point for the location of the school is that identified in the Stag Brewery site brief.

In terms of the Group's comments that the site is more suitable for a primary school, it should be noted that the current School Place Planning Strategy, as revised in October 2015, states a need for a 2-form of entry primary on the Barnes Hospital site. However, it is understood that the need for more primary places has decreased since then and the need for new Special Education Needs (SEN) school places in the borough

primary school pupils in this area who go on to attend private secondary schools, the proportion at Sheen Mount for example being as much as 65%.

- All in all therefore we are of the view that existing schools in the area can cope with the expansion of population in the primary schools and that a new secondary school is not required.

- However, if the Council insists on providing a new 6-form entry secondary school then the proposed site at Mortlake is not suitable. Our concern is that the provision of such a school – in order to be comparable with the other secondary schools in the area – will require a site of about 4 ha including the existing sports fields, leaving only 4.6 ha for the housing development and new village centre for Mortlake (the total site area being 8.6 ha).

- We are also concerned about the location of this secondary school. We have not seen the latest emerging plans and are wondering if the chosen location is alongside the Lower Richmond Road rather than on the 'inland' site of the primary school shown in the development brief. Schools should not be located alongside heavily congested roads with high pollution levels.

- The Council in their School Place Planning Strategy have not given any indication of the alternative sites considered.

- We are of the view that a secondary school at Barn Elms would offer significant advantages over one on the Brewery site, viz. it fills a gaping hole in an area lacking such a school, it has access to 30 ha of playing fields on its doorstep, and it is on land in Council ownership. Our study of Barn Elms has been the subject of a separate submission to the Council.

- We are also of the opinion that the Brewery site is more suitable for a primary school, rather than the site proposed at Barnes Hospital (SA 28) which has such poor access.

2. The Sports Fields

The development brief states (para 5.38) that “the existing sports recreation ground on the site is allocated as Other Open Space of Townscape Importance. Future proposals for the site will need to ensure that the development adjacent to the area of open land has regard to the visual impact on the character of the open land. The Council will

has considerably increased.

Consequently, the School Place Planning Strategy is being revised at the moment to prioritise the need for a special free school on the Barnes Hospital site, which would take up a similar amount of space as a 2-form of entry primary school.

The Local Plan and its policy do not propose building on the playing field, which is designated as Other Open Land of Townscape Importance (OOLTI). In addition, the Council has never proposed for the playing fields to be provided off-site. OOLTI has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. It is acknowledged that the OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances. However, it should be noted that any such re-provision would have to be on this site and not off-site or elsewhere in the Mortlake area.

To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. *This includes the retention and/or re-provision and upgrading of the playing field within the site.*"

seek the retention of the two existing football pitches/one cricket pitch for increased public use.”

We note, however, that the Council's strategy for the site which originally included "the retention and upgrading of the playing field" now includes "the retention and/or re-provision and upgrading of the playing field." There is no reference to re-provision in the supporting text and it is therefore not clear whether this re-provision is supposed to be on-site or off-site. If on-site, it implies that residents who currently enjoy views of the sports grounds may be denied such views in the future. If off-site, such re-provision can only be achieved through conversion of common land or parkland, which will be contentious. Re-provision on-site in the form of an all-weather pitch instead of natural grass will also be contentious.

These sports fields are a valuable local asset, they have never been built on and they were used as a training ground by the England football team before they won the World Cup in 1966.

3. The Housing Density

There is no guidance in the SA 24 strategy about housing density. We note an earlier reference in the Local Plan (para. 9.1.6) indicating that "development should optimise housing provision for different types of location within the relevant density range taking into account the London Plan Density Matrix."The location here is seen as having an urban setting and a somewhat limited public transport accessibility level (PTAL), for which the top end of the relevant density range in the London Plan Density Matrix is 450 habitable rooms per hectare.

We have calculated the density to be in the region of 420 habitable rooms per hectare when applied across the whole site. This is higher than the density of comparable recent developments on the Barnes and Kew Riversides and is similar to the density of the recently approved redevelopment of the Teddington Studios which has clearly served as a precedent. However, part of the site has to be excluded from the calculations, namely the existing sports fields and the land required for the secondary school and village centre, and this could result in a significantly higher density (possibly twice as high). Such an increase in density would result in a significantly higher and more massive housing development which would reduce the quality of life for its residents and for the existing community.

It should be noted that according to the 2011 Census

In relation to the comments made on density, the Council considers that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. Policies need to be sufficiently flexible, for example to take account of changing market conditions, as well as deliverable, and therefore they should not be too prescriptive. The scale, density and massing of the proposed uses and the potential impacts of the proposal, including on character, transport, and amenity, will be assessed as part of consideration of a planning application. In addition, the developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies as well as the National Planning Policy Framework and national guidance. No further changes proposed.

there are 4,771 households occupying 185 ha in the Mortlake/Barnes Common ward. The proposed 1,050 households (including 200 sheltered) should by the same token be occupying about 40 ha but will in practice be occupying nearly one tenth of that.

4.The Traffic Threshold

In our comments on the Pre-publication Local Plan we expressed concern that the increase in density will also have an adverse impact on traffic in Lower Richmond Road which is already congested in the peak hour due to constraints at the Chalkers Corner junction at one end and the Sheen Lane junction and level crossing at the other.

The Council's response was that "any redevelopment proposal will require a full Transport Assessment, as part of which surveys will need to be carried out to ensure there are not demonstrably negative impacts on the wider area and residents' amenity."

We believe there will be negative impacts in terms of more congestion and air pollution and we wonder whether such impacts can indeed be mitigated.

Overall Development

In conclusion we feel that the strategy for the Mortlake Brewery site is 'unsound'. We note that the Inspector at the Public Examination has to be satisfied that the Plan is 'positively prepared, justified, effective and consistent with national policy.'

The Plan has not been 'positively prepared' because the strategy for the Stag Brewery is a recipe for an overdevelopment of the site which is unsustainable. It can not be 'justified' because there is no evidence of alternatives having been considered. It can not be 'effective' because there is no evidence of the Council having liaised with neighbouring authorities on the issue of school places. And it is 'not consistent with national policy' - in this case London Plan policy - because there is no guidance on housing density other than the earlier reference to the London Plan Density Matrix which we understand is being ignored.

164	303	Stephen Webb & Carla Madureira	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>I write in relation to the consultation in respect of the Council's final draft local development plan, in particular as it pertains to Mortlake's Stag Brewery (Site Allocation 24).</p> <p>1. BACKGROUND</p> <p>I am a resident of Williams Lane and live adjacent to the Stag Brewery site. I acquired the property on construction in December 2011, after publication of the 2011 APB referenced below and the public consultation which that followed. I made the purchase in reliance upon those plans, albeit recognising that the final details of any planning consent would need to be ironed out at the relevant time. Significant to this decision was the site of the proposed primary school, given the Borough's extreme shortage of primary education.</p> <p>The location of the Williams Lane and Trinity Mews residences is set out in the Indicative Plan (referred to below) as 'Approved residential development'; the development on Williams Lane and Wadham Mews was completed in 2012 and is referred to in this summary and my representations as the Trinity Mews Development. It can be seen to the north-west of the Site in the picture shown at page 5 here (https://www.geraldeve.com/wp-content/uploads/2015/08/Stag-Brewery-Mortlake-Brochure.pdf).</p> <p>I have had the benefit of discussing recently the matters raised in this summary with 10 other homeowners on the Trinity Mews Development. I believe the position stated accurately reflects the standpoint of those residents, subject of course to any contrary opinions they may themselves put forward as part of this process, either directly or through the Mortlake Brewery Community Group or any other organisation. Furthermore, the key points made in the representations have also been communicated to the management committee for proprietors and tenants of the c. 63 flats on the Trinity Mews Development. I have received support for the positions stated herein; no-one has opposed it.</p> <p>The presence of the Trinity Mews Development and the views of the Trinity Mews Development residents should properly be taken into account when formulating any revisions to the Site use. The proposed development, if insensitively pursued as appears inevitable from the Draft Local Plan, could blight the lives of the residents both during the construction phase and for years to come.</p>	<p>[NB - APPEAR TO HAVE REACHED CAPACITY IN CELL TO LEFT; REPRESENTATION TEXT CONTINUED BELOW]</p> <p>(a) there is a pending application for Local Green Space designation, which the Local Plan should be acknowledging and expressly accepting;</p> <p>(b) trees on the playing fields are the subject of one or more tree preservation orders;</p> <p>(c) key users have not been consulted, including Sport England and Barnes Eagles football club; and</p> <p>(d) this is a green field space, which the National Policy Planning Framework seeks to require local authorities to protect in Local Plans.</p> <p>6. CONCLUSION</p> <p>6.1 There remains a fantastic opportunity to develop the Site in accordance with the aims of the 2011 APB. My understanding is that that plan, including the indicative site plan from the 2011 APB, would continue to be supported by a significant majority of local stakeholders for whom this is a significant issue. That plan was and should remain the 'Plan A', which will deliver sustainable development for Mortlake and the wider Richmond Borough.</p> <p>6.2 Residents entirely recognise that the Council faces competing demands requiring an analysis of complex facts and difficult decisions – although they would like to see evidence that the Council has properly undertaken that analysis. They even acknowledge that – in some shape or form – secondary education places will be required in the Borough at some point over the medium to long term. However, that does not mean we should collectively accept what is quite clearly a sub-optimal solution here when one gets into the detail. It is using a sledgehammer to crack a nut. And it most certainly does not mean that sub-optimal solutions should be accepted where due process and the principles of natural justice and legitimate expectation have not been followed.</p>	<p>See the Officer response to Comment ID 45 and Comment ID 195 above in relation to the need for a secondary school, the consideration of alternative sites and the protection of the OOLTI.</p> <p>See the Officer response to Comment ID 259 in relation to the application for the Local Green Space designation. In relation to the comments on the TPOs, it should be noted that the Local Plan and its policies will need to be applied as a whole, including Policy LP 16 Trees, Woodlands and Landscape. Sport England and Barnes Eagles Football Club have been consulted as part of the Local Plan consultations, and both have responded to this consultation.</p>
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In this summary and the representations, I have used the following terms:

(a) “**Draft Local Plan**” means the ‘Council’s Local Plan’ on which consultation responses are presently sought, found in redline against the previous version at http://www.richmond.gov.uk/combined_local_plan_publication_tracked_changes_after_cabinet.pdf; and

(b) “**Site**” means the Stag Brewery site the subject of Site Allocation 24 in the Draft Local Plan’

(c) “**2011 APB**”, the document entitled ‘Supplementary Planning Document Stag Brewery, Mortlake, SW14 Planning Brief Adopted July 2011’ – found at http://www.richmond.gov.uk/stag_brewery_2010-2.pdf.

Finally, I refer to the pre-consultation scoping exercise in relation to the village plans carried out in January 2016, my responses thereto (my **Pre-Consultation Responses**) – accompanying this summary for reference – and your short-form responses on those (**RBC Pre-Consultation Response Comments**).

2. SUMMARY OF POSITION

2.1 In my Pre-Consultation Responses, I reiterated that residents had (literally) bought into the opportunity to create a new village heart for Mortlake. One that would cater for existing and new communities alike, across a range of facilities and uses designed to promote Mortlake to the fullest extent possible. That vision was set out clearly in the 2011 APB.

2.2 I also highlighted a number of issues with the Council’s proposal in late 2015, without public consultation, to establish a six-form entry secondary school, plus sixth form, on the Site instead of the much-needed primary school contemplated by the 2011 APB. I alluded to a number of substantive and procedural issues with these proposals and recommended that further plans incorporate a primary school (as approved in the 2011 APB), at least in the alternative to avoid the Council progressing (at taxpayers’ expense) on the basis of an unworkable, and non-compliant, draft local plan.

2.3 These issues were not properly addressed in the RBC Pre-Consultation Response Comments, nor in the subsequent pre-consultation draft local plan which continued to provide – in abstract terms only – for a large secondary school in place of a primary school. This simply

does not work, and there are alternatives.

2.4 The final Draft Local Plan made available in January of this year also now contemplates (for the first time) the 'reprovision' of the playing fields that form an intrinsic part of the Site. Those playing fields were expressly protected by the 2011 APB and are of special local and historical importance. There is no commentary in the Draft Local Plan explaining this, however we understand it may be to accommodate the secondary school referred to above. The playing fields must continue to be protected.

2.5 For the reasons that follow, and set out in much further detail in my full representations, I am firmly of the view that the Council has erred, in process and substance, in reaching the conclusions it appears to have reached in formulating SA 24 of the Local Plan for Mortlake. It is not legally compliant and it is unsound.

2.6 I also have material reservations as to whether or not the Council has complied properly with the duty to co-operate. A number of organisations have clear views on the proposal to remove the playing fields, for instance. I would also expect TfL to have strong views on the deliverability of the scheme in light of what that would entail by way of material improvements to public transport and the road network. In any event, the degree of co-operation with the local community contemplated by the National Planning Policy Framework has not been met.

2.7 The residents of the Trinity Mews Development would like to be in a position to examine these issues against concrete land-use proposals from the developer and/or the Council. The Council has asserted a requirement for a large secondary school, without giving any evidence to the community or (publically) the developer as to how this might be accommodated. The developer's own plans are expected to be made known to the community – despite repeated requests for earlier engagement since the land was acquired – only next month, in March 2017, after the closure of the Local Plan consultation. This is not acceptable. Nonetheless, I can but make these representations on the basis of the facts and generic statements as presently known to me.

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Council's decision-making processes and the resultant decisions. We would also strongly recommend the Council either drops the offending provisions of the Local Plan, or at least progresses the Local Plan in the alternative (i.e. with a primary school, retained playing fields and substantially low density housing), until such legal issues are resolved to avoid additional delay to the scheme and cost to taxpayers. **We fervently wish to see a sensible plan progress.**

2.9 Pending this, we expressly reserve all rights and invite the Inspector to take the lead on recognising that what is currently proposed falls a long way short of the procedural steps necessary to incorporate the proposal within the Draft Local Plan but, more importantly, is simply unworkable in its present form.

3. REQUIREMENT FOR A SECONDARY SCHOOL ON THE SITE

3.1 Representation 2 relates to the 'clear need' (according to the Draft Local Plan) for a large secondary school on the Site. This has certainly not been made out, neither at the time the Cabinet adopted the updated School Place Planning Strategy in 2015, nor subsequently.

3.2 The School Place Planning Strategy offers scant insight into how the Cabinet concluded the Site would need to house a large secondary school, plus sixth form. (In fact, it doesn't refer to a sixth form at all – the Draft Local Plan appears to have made that up).

3.3 It sets out, based on recent historical demographic information, how there will likely be a need for new places over the course of the medium-to-long term in the eastern part of the Borough.

3.4 It then jumps, without analysis, to a conclusion that the Site is the only place a new large secondary school can be accommodated. In so doing, it:

- (a) disregards the possibility of two or three smaller schools, on different sites, meeting the perceived shortfall in places – it is obvious that the number of sites big enough to accommodate a school for up to 1,500 pupils and staff will be limited, yet the Education Funding Agency's remit appears to have covered only larger site capacity;
- (b) disregards other sites, with *prima facie* better attributes, which are or may become available – why?;
- (c) acknowledges the need to consider (i) availability of

places outside the Borough and (ii) expansion of existing schools – but then fails to do that: the Local Plan cannot be adopted whilst this further pre-conditional analysis is acknowledged to be outstanding;

(d) disregards the equally pressing need for a primary school in the local area which the 2011 APD provided for;

(e) creates an artificial distinction between the eastern and western parts of the Borough and preventing children travelling an artificial, and in national terms rather short, 6 miles to school – the Education Act 1996, from which the requirement to provide education is derived – makes no such distinction and there are clear, practical reasons to avoid making such a distinction;

(f) crucially, offers no analysis as to the consequences of the decision, principally how it could be delivered alongside the competing requirements of the 2011 APB more generally, but in particular in relation to traffic circulation and access – the Sustainability Appraisal Report is testimony to this; and

(g) seems to disregard the fact that emissions of noxious gases adjacent to the Site already exceed legal or recommended safe levels, and that will be exacerbated in any event by the new development: does the Council really want our children, and its staff, to spend the majority of their waking hours in a known pollution hotspot? To do so would be gross negligence, at a minimum.

3.5 In my representations, I identify a number of other legal issues with that decision. But it is worth noting that, according to the minutes of that Cabinet meeting, it lasted just 17 minutes. Just 17 minutes to reach a conclusion of significant local importance and which in essence reverses a key component of the (heavily consulted upon) 2011 APB. And that was 17 minutes in total to resolve not just on this issue, but also some twelve other issues on the agenda that night. If that was truly the case, no wonder such an unworkable proposal was the outcome.

3.6 Notwithstanding the purported adoption by the Cabinet of that policy, it is in any event not appropriate for the Council planning department to ‘rubber-stamp’ the Cabinet decision which was based on primarily on matters of education policy. The Draft Local Plan is a planning document contemplated by statute, the production of which needs to meet a number of procedural and substantive criteria, including under the National Planning Policy Framework. Underpinning that document should be an impartial and balanced assessment of the impact of a proposal, of the deliverability and sustainability of a proposal, based on proportionate evidence. Simply to rely

on the School Place Planning Strategy – with all the inherent weaknesses mentioned above - as the principal and only evidence that a planning decision is appropriate, is a dereliction of duty. The Sustainability Appraisal Report in its present form, as it relates to SA 24, demonstrates that the Council does not have a handle on all the important issues at stake. We, the local community, do.

3.7 But the crux of the issue is this: the entire vision for Mortlake set out in the 2011 APB (see below, in italics) will be jeopardised if this is allowed to proceed. There is finite space on the Site. The 2011 APB itself represented a compromise between the Council, the local community and other stakeholders. Seeking to replace a small primary school with a large secondary school on the site will inevitably curtail the ability of the developer to deliver what everyone had agreed should be delivered after that compromise. The result will be that important aspects of the 2011 APB are lost, or are pigeon-holed into spaces not fit for purpose, whilst the local community suffers the negative effects of a large secondary school in an area with limited access and high levels of pollution. Add to that the ‘reprovision’ of the playing fields, proposed very late in the day (i.e. just a month ago). For all the technical arguments against adopting the Local Plan in its present form – and these are with real merit here – losing the ability to deliver a sensible, sustainable plan with local support, is what the community is not willing to see happen.

“...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”

3.8 The Draft Local Plan purports to safeguard the aims of the 2011 APB, but offers no guidance as to whether or how this can be achieved in light of the proposal for a large secondary school. There can, as a matter of substance, be no consultation on a matter so abstract to the extent it is inconceivable. Contrast this with the 2011 APB consultation which included a series of questionnaires and presentations on the back of four alternative concrete land-use and density proposals, and it is apparent how this purported consultation falls short of legal requirements,

including the legitimate expectation of the same this time around – which cannot take place if the Local Plan is adopted in its present form. The Council is in any event under a duty to co-operate with the local community in formulating a Local Plan, but cannot for the last twelve months be said to have done anything other than disregard, and even frustrate, the well-voiced views of the community.

4. RESIDENTIAL HOUSING

4.1 Representation 3 relates to residential housing capacity. The Local Plan does not address residential housing capacity on the Site. There is an opportunity to give the developer a clear steer on this and, consequently, on what space is available for other commercial and community uses.

4.2 The Draft Local Plan does, however, expressly adopt the 2011 APB, which made a number of conclusions as to housing densities and site layout – for instance, to keep taller buildings to the existing footprint and to ensure buildings at the north-western part of the Site do not exceed two-to-three stories.

4.3 Furthermore, the Council, in its responses to earlier consultation rounds, re-affirmed the latest Authority's Monitoring Report on Housing, which provided for an estimate of 200 to 300 dwellings in total.

4.4 The Council is invited to expressly re-affirm these limits, subject to downward revision to the extent necessary to accommodate any change the Council requires from a primary school to a secondary school. If there is ultimately a secondary school, any reduction in space must come from residential housing (pro rata across affordable and other housing).

5. PLAYING FIELDS

5.1 Representation 4 relates to the reference in the Draft Local Plan to the 'reprovision' of the playing fields. Re-provision is undefined, and unexplained, but (i) appears impossible to achieve on the Site and (ii) if that is the case, is akin to removal of the playing fields. This despite the 2011 APB expressly committing to protect them.

5.2 There are a number of issues with this. Perhaps first and foremost, they are a valued green space where green spaces are of a premium. Ask Barnes Eagles football club who use them for home games. Or Thomson House

									<p>school whose pupils do not otherwise have access to playing fields. Or any number of local residents who look on to or pass them frequently. They also have historical importance – England’s only World Cup winning football team I understand trained there. And not to mention that they are home to a variety of flora and fauna which interact with local and riverside eco-systems.</p> <p>5.3 From a procedural perspective, there are also a number of further issues this raises: access to playing fields. Or any number of local residents who look on to or pass them frequently. They also have historical importance – England’s only World Cup winning football team I understand trained there. And not to mention that they are home to a variety of flora and fauna which interact with local and riverside eco-systems. 5.3 From a procedural perspective, there are also a number of further issues this raises:</p>	
112	144	Vera Kirikova	SA 24 Stag Brewery, Lower Richmond Road, Mortlake						<p>My message is in support of a secondary school on the brewery site. Richmond has outstanding primary schools but cannot boast the same for the secondary ones. I believe the experience of the primary schools and their success in Richmond's attractiveness and reputation should be used for the secondary schools.</p>	Comments noted. Support welcomed.

160	307	Kate & Geoff Woodhouse	SA 24 Stag Brewery, Lower Richmond Road, Mortlake						<p>Secondary school</p> <p>We are dismayed that the Council is continuing to insist on the provision of an on-site new secondary school. This requirement was introduced to the plan without consultation in late 2015, and no figures to justify it have ever been published.</p> <p>Despite reasoned representations, including those from the developers, pointing out that among other things such a school would inevitably increase housing density on the rest of the site, the Council have treated this requirement as non-negotiable and ignored all other suggestions. At the same time, they continue to list as requirements many of the desirable features in the development plan adopted in 2011, when it is perfectly obvious that these cannot be achieved alongside such a school.</p> <p>This is not sound and non-compliant.</p> <p>Playing field</p> <p>The draft plan includes for the first time, and again without consultation, the words 'and/or reprovision' [of the playing field]. This betrays the commitment made in the development brief to 'seek to protect and enhance' this OOLTI, as well as the Council's then conclusion that it 'must be retained in that location and made more accessible for public use' (Section 2.43).</p> <p>There is simply not the space on the remainder of the site to reprovide this playing field, unless all the other play space anticipated in the development brief is redesignated as 'reprovided playing field'.</p> <p>Housing density</p> <p>The Local Plan (LP34) puts the indicative range of additional housing units in East Sheen, Mortlake and Barnes Common and Barnes wards at 400 – 500. This would be acceptable. The site is not big enough to support the current proposal for 1000 housing units and a secondary school.</p>	See the Officer response to Comment ID 45 above.
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168	64	Linda Duberle u	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>1. BACKGROUND</p> <p>I am a resident of Williams Lane and live adjacent to the Stag Brewery site. I acquired the property on construction in June 2012, after publication of the 2011 APB referenced below and the public consultation which that followed. We made the purchase in reliance upon those plans, albeit recognising that the final details of any planning consent would need to be ironed out at the relevant time.</p> <p>The location of the Williams Lane and Trinity Mews residences is set out in the Indicative Plan (referred to below) as ‘Approved residential development’; the development on Williams Lane and Wadham Mews was completed in 2012 and is referred to in this summary and our representations as the Trinity Mews Development. It can be seen to the north-west of the Site in the picture shown at page 5 here.</p> <p>I have had the benefit of discussing recently the matters raised in this summary with 10 other home owners on the Trinity Mews Development. We believe the position stated accurately reflects the standpoint of those residents, subject of course to any contrary opinions they may themselves put forward as part of this process, either directly or through the Mortlake Brewery Community Group or any other organisation. Furthermore, the key points made in the representations have also been communicated to the management committee for proprietors and tenants of the c. 63 flats on the Trinity Mews Development. We have received support for the positions stated herein; no-one has opposed it.</p> <p>The presence of the Trinity Mews Development and the views of the Trinity Mews Development residents should properly be taken into account when formulating any revisions to the Site use. The proposed development, if insensitively pursued as appears inevitable from the Draft Local Plan, could blight the lives of the residents both during the construction phase and for years to come.</p> <p>In this summary and the representations, I have used the following terms: (a) “Draft Local Plan” means the ‘Council’s Local Plan’ on which consultation responses are presently sought, found in redline against the previous version at http://www.richmond.gov.uk/combined_local_plan_publication_tracked_changes_after_cabinet.pdf; and To Organisation Planning Policy London Borough of Richmond Upon Thames Date 15 February 2017 2i8 (b) “Site” means the Stag Brewery site the subject of Site Allocation 24 in the Draft Local Plan’ (c) “2011 APB”, the document entitled ‘Supplementary Planning Document Stag Brewery, Mortlake, SW14 Planning Brief Adopted July 2011’ – found at http://www.richmond.gov.uk/stag_brewery_2010-2.pdf. Finally, I refer to the pre-consultation scoping</p>	<p>5. PLAYING FIELDS</p> <p>5.1 Representation 4 relates to the reference in the Draft Local Plan to the ‘reprovision’ of the playing fields. Re-provision is undefined, and unexplained, but (i) appears impossible to achieve on the Site and (ii) if that is the case, is akin to removal of the playing fields. This despite the 2011 APB expressly committing to protect them.</p> <p>5.2 There are a number of issues with this. Perhaps first and foremost, they are a valued green space where green spaces are of a premium. Ask Barnes Eagles football club who use them for home games. Or Thomson House school whose pupils do not otherwise have access to playing fields. Or any number of local residents who look on to or pass them frequently. They also have historical importance – England’s only World Cup winning football team I understand trained there. And not to mention that they are home to a variety of flora and fauna which interact with local and riverside ecosystems.</p> <p>5.3 From a procedural perspective, there are also a number of further issues this raises: (a) there is a pending application for Local Green Space designation, which the Local Plan should be acknowledging and expressly accepting; (b) trees on the playing fields are the subject of one or more tree preservation orders; (c) key users have not been consulted, including Sport England and Barnes Eagles football club; and (d) this is a green field space, which the National Policy Planning Framework seeks to require local authorities to protect in Local Plans. (e) the LBRUT Village Plan for the Mortlake area (http://www.richmond.gov.uk/home/my_richmond/village_plans/mortlake_area_village_plan_xx/planning_and_development_mortlake.htm) designated the playing fields at Williams Lane as protected open land.</p> <p>6. CONCLUSION</p> <p>6.1 There remains a fantastic opportunity to develop the Site in accordance with the aims of the 2011 APB. My understanding is that that plan, including the indicative site plan from the 2011 APB, would continue to be supported by a significant majority of local stakeholders for whom this is a significant issue. That plan was and should remain the ‘Plan A’, which will deliver sustainable development for Mortlake and the wider Richmond Borough.</p> <p>6.2 Residents entirely recognise that the Council faces competing demands requiring an analysis of complex facts and difficult decisions – although they would like to see evidence that the Council has properly undertaken that analysis. They even acknowledge that – in some shape or form – secondary education places will be required in the Borough at some point over the medium to long term. However, that does not mean we should collectively accept what is quite clearly a sub-optimal solution here when one</p>	<p>See the Officer response to Comment ID 45 and Comment ID 195 above in relation to the need for a secondary school, the consideration of alternative sites and the protection of the OOLTI.</p> <p>See the Officer response to Comment ID 259 in relation to the application for the Local Green Space designation. In relation to the comments on the TPOs, it should be noted that the Local Plan and its policies will need to be applied as a whole, including Policy LP 16 Trees, Woodlands and Landscape. Sport England and Barnes Eagles Football Club have been consulted as part of the Local Plan consultations, and both have responded to this consultation.</p>
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gets into the detail. It is using a sledgehammer to crack a nut. And it most certainly does not mean that sub-optimal solutions should be accepted where due process and the principles of natural justice and legitimate expectation have not been followed.

entail by way of material 3i8 improvements to public transport and the road network. In any event, the degree of co-operation with the local community contemplated by the National Planning Policy Framework has not been met.

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- (h) Disregards the effect upon Richmond Park Academy (RPA) which currently holds 650 pupils but has space for several hundred more. According to two key school governors a secondary school on this site would severely impinge on the progress made by RPA and, in their words, would mean the planned school would be set up to fail.

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a key component of the (heavily consulted upon) 2011 APB. And that was 17 minutes in total to resolve not just on this issue, but also some twelve other issues on the agenda that night. If that was truly the case, no wonder such an unworkable proposal was the outcome.

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and presentations on the back of four alternative concrete land-use and density proposals, and it is apparent how this purported consultation falls short of legal requirements, including the legitimate expectation of the same this time around – which cannot take place if the Local Plan is adopted in its present form. The Council is in any event under a duty to co-operate with the local community in formulating a Local Plan, but cannot for the last twelve months be said to have done anything other than disregard, and even frustrate, the well-voiced views of the community.

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4.3 Furthermore, the Council, in its responses to earlier consultation rounds, re-affirmed the latest Authority’s Monitoring Report on Housing, which provided for an estimate of 200 to 300 dwellings in total.

4.4 The Council is invited to expressly re-affirm these limits, subject to downward revision to the extent necessary to accommodate any change the Council requires from a primary school to a secondary school. If there is ultimately a secondary school, any reduction in space must come from residential housing (pro rata across affordable and other housing).

170	155	Kate Le Vesconte	SA 24 Stag Brewery, Lower Richmond Road, Mortlake	No	No	No					<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.</p>	<p>Amend as follows, (i) replacing references to the secondary school with a primary school of the type approved in the 2011 adopted supplementary planning brief for the site and (ii) removing the reference to the 'reprovision' of the playing fields.</p> <p>Suggested amended text 8.2.11 Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan: Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form of entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school</p> <p>13.1.7 13.1.7 A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population. Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses: Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form of entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school</p> <p>SA 24 Stag Brewery, Lower Richmond Road, Mortlake The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 2-form entry primary school, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure</p>	See Officer response to Comment ID 45 above.
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sacrificing community, business and retail space and/or having taller buildings of housing than was agreed in the Development Brief. The MCA is keen that this development should bring the heart back into Mortlake, as was planned in 2011.

A secondary school with similar facilities to others in the borough would take up a large proportion of this site. We would not want to see a school without adequate outdoor space, our children deserve better. The site is not well served by public transport, and it is hemmed in by the river, the busy Lower Richmond Road/Mortlake High Street with the added burden of the railway and the Sheen Lane level crossing. A difficult journey for students, the school would add to the already considerable traffic that will be increased by the new residents. More traffic generates more pollution, already at an unacceptably high level in the area. It is known that pollution from cars harms children's health and learning.

A primary school would be acceptable on the site and would add to the community of Mortlake. It would be preferable to the suggestion at SA.27 of the Barnes Hospital site which has extremely poor and dangerous access for both pedestrians and vehicles. Barnes Hospital is very near Barnes, East Sheen, St Mary Magdalen's and Thomson House schools but far from the children living in the new housing development who will need a primary school.

Playing Field

The Development Brief and the Pre-Publication Local Plan agreed on the retention and improvement of the present playing field on the site. The Publication Local Plan has introduced 'reprovision' of the field. The MCA strongly objects to this change, again made without consultation and against the earlier public conclusion 'that it [the playing field] must be retained in this location, and made more accessible for public use' (clause 2.43 of the Development Brief).

The Development Brief also included an open space linking Mortlake Green to the river where the community hub and heart would be housed in and around the Maltings. This must be included in the plans.

Housing

The MCA understands that the developer is proposing 850 apartments, 200 sheltered housing units and residential units in the upper floors of the Maltings. The Local Plan (LP34) puts the indicative range of housing in East Sheen,

Mortlake and Barnes Common and Barnes wards at 400-500. This would be acceptable. The site is not big enough to support the current proposal for housing combined with a secondary school.

Traffic

The traffic generated by the proposed secondary school and density of housing would make travel in Mortlake unacceptably onerous. Traffic is already a significant issue around Mortlake and at Chalker's Corner, there is no space for more. There is only one infrequent bus that passes the development, an inadequate service for this site. The extension of the 209 from Avondale Road would help, but turning point will need valuable space.

General

The heart of Mortlake was ripped out in the 1960s with the demolition of many shops in the High Street and the building of the dual carriageway. This development is a unique opportunity to restore that heart, enhance the community and open up access to the river. It will be difficult to achieve this with the proposed secondary school and density of housing. We need to be able to breathe in this new development on a very special site, not just exist.

172	9	John Arrowsmith	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>As a long-term resident of the above property, which is adjacent to the Stag Brewery site, I wish to offer the following comments.</p> <p>I fully support the comments already submitted by the Mortlake Brewery Community Group. In particular, I note the incompatibility in several crucial respects between the Publication Local Plan and the stated objectives of the development brief adopted in 2011, most especially the intensity of the development and variety of uses now being proposed and the original objective of creating a new village heart and centre for Mortlake. Rather than "adding to the heart and vitality" of Mortlake, the Plan threatens to clog up and strangle it. The key contradictions are:</p> <ol style="list-style-type: none"> 1. the proposal to replace the original plan for a 2-form of entry primary school with a 6-form of entry secondary school plus sixth form, which would encroach on a much greater surface area of the site and add considerably to the transport requirements and traffic pollution at the site and over the surrounding area; 2. the developer's intention to provide 850 apartments plus 200 "sheltered units", with the majority being 3- and 4-bedroom family units, which could imply some 3,000-4,000 occupants, creating an excessive housing density; 3. the objective of achieving, in addition to the above, "a substantial mix of small businesses, creative units and scientific and technical industries, including green technology retail and other commercial uses, such as cafés and restaurants as well leisure, sport and health uses"; 4. and, despite all of the above, retaining the existing Buildings of Townscape Merit, with an on-site museum and "a new green space and high-quality link between the river and Mortlake Green"; 5. relocation of the bus access and turning points from Avondale Road, which would be an additional claim on the available space; 6. the "retention and/or <i>reprovision</i> and upgrading of the playing field" (as against the development brief's intention to "seek the retention of the two existing football pitches/one cricket pitch for increase public use"), which implies that the existing playing field could be sacrificed on the altar of an over-ambitious and unrealistic Plan. 	See Officer response to Comment ID 45 above.
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182	287	Timothy Thomas	SA 24 Stag Brewery, Lower Richmond Road, Mortlake	No	No	No	Yes	Yes	Yes	Yes	<p>Generally, I endorse the views expressed by Mortlake Brewery Community Group in its representation(s).</p> <p>Please note also that: Without fully detailed concomitant changes to roads, train frequency and bus routes, this is a crass proposal.</p> <p>Road traffic Lower Richmond Road between the A316 at Chalkers Corner and the current dogleg near the brewery is often clogged: traffic coming from the Sheen Lane railway crossing and from the direction of Barnes along Mortlake High Street is often at a standstill. As a result traffic sometimes gets stuck on the Sheen Lane railway crossing, due admittedly to bad driving discipline but also to frustration, and sometimes it even backs up to the lights at the Richmond Road West junction with Sheen Lane. The woodyard and the builder's merchant near to the Sheen Lane crossing exacerbate the problem as does the proximity of Tesco near the Sheen lane crossing where delivery vans park on a road that is too narrow for them. Despite about a hundred yards of dual carriageway at the Sheen end of Mortlake High Street, roadways adjacent and leading to the site of the proposed development are effectively single-track. Traffic leaving a large residential estate will make the situation chaotic.</p> <p>Trains Mortlake station has dangerously narrow platforms at rush hour times. More trains will be necessary to accommodate the increased local population implicit in the development proposal, which will aggravate the problems with the roads. the railway crossing barriers are down just short of thirty minutes in every hour already!</p> <p>Buses Currently no buses use Sheen Lane and only one goes along Mortlake Road to Chalkers Corner. These buses have turning circles that block two lanes as they turn left onto the A316, blocking the flow behind them. More buses will increase traffic problems. Overall the proposal will add gridlock to gridlock as well as causing ill-health through stress and pollution.</p> <p>Recreational space the green sports ground currently next to Mortlake Road is a valuable community asset. No matter who owns the ground, the Council should regard the continued availability of and access to this facility as sacrosanct. Bringing more houses and a school to the area means more children. More children should involve the provision</p>	<p>Amend as follows, (i) replacing references to the secondary school with a primary school of the type approved in the 2011 adopted supplementary planning brief for the site and (ii) removing the reference to the 'reprovision' of the playing fields.</p> <p>Suggested amended text 8.2.11 Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan: Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form of entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school</p> <p>13.1.7 13.1.7 A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population. Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses: Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form of entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school</p> <p>SA 24 Stag Brewery, Lower Richmond Road, Mortlake The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 2-form entry primary school, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure</p>	<p>See Officer response to Comment ID 45 above.</p> <p>It is considered that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. Policies need to be sufficiently flexible, for example to take account of changing market conditions, as well as deliverable, and therefore they should not be too prescriptive. The scale, density and massing of the proposed uses and the potential impacts of the proposal, including on character, transport, and amenity, will be assessed as part of consideration of a planning application. In addition, the developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies, including policies on transport and parking, as well as the National Planning Policy Framework and national guidance.</p>
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									<p>of more not less recreational space.</p> <p>It beggars belief that this proposal is being considered. It is simply not practical without huge changes to roads, railway crossings and junctions: at least five years' work (even after years of planning), road widening, strengthening The Terrace through Barnes, a bridge to replace the Sheen Lane railway crossing, a re-design of Chalkers Corner involving an underpass or overpass or probably both or a subterranean river crossing and roundabout the London-side of Chiswick Bridge, collaboration between authorities governing road, rail and London transport of the kind that never goes smoothly in the UK, plus a couple of billion pounds, to provide a sensible context for the kind of plan being proposed. Only when this re-design is delivered should the kind of proposal be brought forward that you ask the community to consider. that probably means never, and back - hopefully more soberly- to the drawing board.</p>	<p>uses, including the retention and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.</p> <p>[A corresponding change should be made to the text on page 107 of the Sustainability Appraisal Report as it relates to SA24.]</p> <ul style="list-style-type: none"> • The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities. • The brewery operations on this site have ceased at the end of 2015; the site has been marketed and sold. • There is a need to create a new village heart and centre for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities. • There is a clear need for a new primary school in this area. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school. • [Remaining text unchanged] 	
221	163	Carla Madureira	SA 24 Stag Brewery, Lower Richmond Road, Mortlake	No	No				<p>I am a resident of Williams Lane and live adjacent to the Stag Brewery site. I acquired the property on construction in December 2011, after publication of the 2011 APB referenced below and the public consultation which that followed. I made the purchase in reliance upon those plans, albeit recognising that the final details of any planning consent would need to be ironed out at the relevant time. Significant to this decision was the site of the proposed primary school, given the Borough's extreme shortage of primary education.</p> <p>The location of the Williams Lane and Trinity Mews residences is set out in the Indicative Plan (referred to below) as 'Approved residential development'; the development on Williams Lane and Wadham Mews was completed in 2012 and is referred to in this summary and my representations as the Trinity Mews Development. It can be seen to the north-west of the Site in the picture shown at page 5 here.</p> <p>I have had the benefit of discussing recently the matters raised in this summary with 10 other homeowners on the Trinity Mews Development. I believe the position stated accurately reflects the standpoint of those residents, subject of course to any contrary opinions they may themselves put forward as part of this process, either directly or through the Mortlake Brewery Community Group or any other organisation. Furthermore, the key points made in the representations have also been communicated to the management committee for</p>	<p>2. SUMMARY OF POSITION</p> <p>2.1 In my Pre-Consultation Responses, I reiterated that residents had (literally) bought into the opportunity to create a new village heart for Mortlake. One that would cater for existing and new communities alike, across a range of facilities and uses designed to promote Mortlake to the fullest extent possible. That vision was set out clearly in the 2011 APB.</p> <p>2.2 I also highlighted a number of issues with the Council's proposal in late 2015, without public consultation, to establish a six-form entry secondary school, plus sixth form, on the Site instead of the much-needed primary school contemplated by the 2011 APB. I alluded to a number of substantive and procedural issues with these proposals and recommended that further plans incorporate a primary school (as approved in the 2011 APB), at least in the alternative to avoid the Council progressing (at taxpayers' expense) on the basis of an unworkable, and non-compliant, draft local plan.</p> <p>2.3 These issues were not properly addressed in the RBC Pre-Consultation Response Comments, nor in the subsequent pre-consultation draft local plan which continued to provide – in abstract terms only – for a large secondary school in place of a primary school. This simply does not work, and there are alternatives.</p> <p>2.4 The final Draft Local Plan made available in January of this year also now contemplates (for the first time) the 'reprovision' of the playing fields that form an intrinsic part</p>	<p>See the Officer response to Comment ID 45 and Comment ID 195 above in relation to the need for a secondary school, the consideration of alternative sites and the protection of the OOLTI.</p> <p>See the Officer response to Comment ID 259 in relation to the application for the Local Green Space designation. In relation to the comments on the TPOs, it should be noted that the Local Plan and its policies will need to be applied as a whole, including Policy LP 16 Trees, Woodlands and Landscape. Sport England and Barnes Eagles Football Club have been consulted as part of the Local Plan consultations, and both have responded to this consultation.</p> <p>The Council has complied with Section 33 of the Planning and Compulsory Purchase Act 2004 (introduced by the Localism Act 2011), which introduced a duty to co-operate requirement. Further information can be found in the Council's Duty to Co-operate Statement (January 2017) and in the Council's updated Duty to Co-operate Statement (May 2017).</p>

proprietors and tenants of the c. 63 flats on the Trinity Mews Development. I have received support for the positions stated herein; no-one has opposed it. The presence of the Trinity Mews Development and the views of the Trinity Mews Development residents should properly be taken into account when formulating any revisions to the Site use. The proposed development, if insensitively pursued as appears inevitable from the Draft Local Plan, could blight the lives of the residents both during the construction phase and for years to come. In this summary and the representations, I have used the following terms: (a) **“Draft Local Plan”** means the ‘Council’s Local Plan’ on which consultation responses are presently sought, found in redline against the previous version at http://www.richmond.gov.uk/combined_local_plan_publication_tracked_changes_after_cabinet.pdf; and (b) **“Site”** means the Stag Brewery site the subject of Site Allocation 24 in the Draft Local Plan’ (c) **“2011 APB”**, the document entitled ‘Supplementary Planning Document Stag Brewery, Mortlake, SW14 Planning Brief Adopted July 2011’ – found at http://www.richmond.gov.uk/stag_brewery_2010-2.pdf. Finally, I refer to the pre-consultation scoping exercise in relation to the village plans carried out in January 2016, my responses thereto (my **Pre-Consultation Responses**) – accompanying this summary for reference – and your short-form responses on those (**RBC Pre-Consultation Response Comments**).

of the Site. Those playing fields were expressly protected by the 2011 APB and are of special local and historical importance. There is no commentary in the Draft Local Plan explaining this, however we understand it may be to accommodate the secondary school referred to above. The playing fields must continue to be protected.

2.5 For the reasons that follow, and set out in much further detail in my full representations, I am firmly of the view that the Council has erred, in process and substance, in reaching the conclusions it appears to have reached in formulating SA 24 of the Local Plan for Mortlake. It is not legally compliant and it is unsound.

2.6 I also have material reservations as to whether or not the Council has complied properly with the duty to co-operate. A number of organisations have clear views on the proposal to remove the playing fields, for instance. I would also expect TfL to have strong views on the deliverability of the scheme in light of what that would entail by way of material improvements to public transport and the road network. In any event, the degree of co-operation with the local community contemplated by the National Planning Policy Framework has not been met.

2.7 The residents of the Trinity Mews Development would like to be in a position to examine these issues against concrete land-use proposals from the developer and/or the Council. The Council has asserted a requirement for a large secondary school, without giving any evidence to the community or (publically) the developer as to how this might be accommodated. The developer’s own plans are expected to be made known to the community – despite repeated requests for earlier engagement since the land was acquired – only next month, in March 2017, after the closure of the Local Plan consultation. This is not acceptable. Nonetheless, I can but make these representations on the basis of the facts and generic statements as presently known to me.

2.8 Once proper information is provided by the relevant authorities and the developer, we intend to seek expert legal counsel’s advice in relation to the processes as conducted to date and, should we be so advised, to pursue one or more claims for judicial review of the Council’s decision-making processes and the resultant decisions. We would also strongly recommend the Council either drops the offending provisions of the Local Plan, or at least progresses the Local Plan in the alternative (i.e. with a primary school, retained playing fields and substantially low density housing), until such legal issues are resolved to avoid additional delay to the scheme and cost to taxpayers. **We fervently wish to see a sensible plan progress.**

2.9 Pending this, we expressly reserve all rights and invite the Inspector to take the lead on recognising that what is currently proposed falls a long way short of the procedural

It is not the purpose of the Local Plan-making process to assess development proposals, such as the one currently being prepared and consulted on by the developers of the Stag Brewery site. The aim of the Local Plan and policy SA 24 is to set out within an adopted development plan a framework for development on this site against which a future planning application will be assessed against.

steps necessary to incorporate the proposal within the Draft Local Plan but, more importantly, is simply unworkable in its present form.

3. REQUIREMENT FOR A SECONDARY SCHOOL ON THE SITE

3.1 Representation 2 relates to the ‘clear need’ (according to the Draft Local Plan) for a large secondary school on the Site. This has certainly not been made out, neither at the time the Cabinet adopted the updated School Place Planning Strategy in 2015, nor subsequently.

3.2 The School Place Planning Strategy offers scant insight into how the Cabinet concluded the Site would need to house a large secondary school, plus sixth form. (In fact, it doesn’t refer to a sixth form at all – the Draft Local Plan appears to have made that up).

3.3 It sets out, based on recent historical demographic information, how there will likely be a need for new places over the course of the medium-to-long term in the eastern part of the Borough.

3.4 It then jumps, without analysis, to a conclusion that the Site is the only place a new large secondary school can be accommodated. In so doing, it: (a) disregards the possibility of two or three smaller schools, on different sites, meeting the perceived shortfall in places – it is obvious that the number of sites big enough to accommodate a school for up to 1,500 pupils and staff will be limited, yet the Education Funding Agency’s remit appears to have covered only larger site capacity; (b) disregards other sites, with *prima facie* better attributes, which are or may become available – why?; (c) acknowledges the need to consider (i) availability of places outside the Borough and (ii) expansion of existing schools – but then fails to do that: the Local Plan cannot be adopted whilst this further pre-conditional analysis is acknowledged to be outstanding; (d) disregards the equally pressing need for a primary school in the local area which the 2011 APD provided for; (e) creates an artificial distinction between the eastern and western parts of the Borough and preventing children travelling an artificial, and in national terms rather short, 6 miles to school – the Education Act 1996, from which the requirement to provide education is derived – makes no such distinction and there are clear, practical reasons to avoid making such a distinction; (f) crucially, offers no analysis as to the consequences of the decision, principally how it could be delivered alongside the competing requirements of the 2011 APB more generally, but in particular in relation to traffic circulation and access – the Sustainability Appraisal Report is testimony to this; and (g) seems to disregard the fact that emissions of noxious gases adjacent to the Site already exceed legal or recommended safe levels, and that will be exacerbated in any event by the new development: does the Council really want our children, and its staff, to spend the majority of

their waking hours in a known pollution hotspot? To do so would be gross negligence, at a minimum.

3.5 In my representations, I identify a number of other legal issues with that decision. But it is worth noting that, according to the minutes of that Cabinet meeting, it lasted just 17 minutes. Just 17 minutes to reach a conclusion of significant local importance and which in essence reverses a key component of the (heavily consulted upon) 2011 APB. And that was 17 minutes in total to resolve not just on this issue, but also some twelve other issues on the agenda that night. If that was truly the case, no wonder such an unworkable proposal was the outcome.

3.6 Notwithstanding the purported adoption by the Cabinet of that policy, it is in any event not appropriate for the Council planning department to 'rubber-stamp' the Cabinet decision which was based on primarily on matters of education policy. The Draft Local Plan is a planning document contemplated by statute, the production of which needs to meet a number of procedural and substantive criteria, including under the National Planning Policy Framework. Underpinning that document should be an impartial and balanced assessment of the impact of a proposal, of the deliverability and sustainability of a proposal, based on proportionate evidence. Simply to rely on the School Place Planning Strategy – with all the inherent weaknesses mentioned above - as the principal and only evidence that a planning decision is appropriate, is a dereliction of duty. The Sustainability Appraisal Report in its present form, as it relates to SA 24, demonstrates that the Council does not have a handle on all the important issues at stake. We, the local community, do.

3.7 But the crux of the issue is this: the entire vision for Mortlake set out in the 2011 APB ("*...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*") will be jeopardised if this is allowed to proceed. There is finite space on the Site. The 2011 APB itself represented a compromise between the Council, the local community and other stakeholders. Seeking to replace a small primary school with a large secondary school on the site will inevitably curtail the ability of the developer to deliver what everyone had agreed should be delivered after that compromise. The result will be that important aspects of the 2011 APB are lost, or are pigeon-holed into spaces not fit for purpose, whilst the local community suffers the

negative effects of a large secondary school in an area with limited access and high levels of pollution. Add to that the 'reprovision' of the playing fields, proposed very late in the day (i.e. just a month ago). For all the technical arguments against adopting the Local Plan in its present form – and these are with real merit here – losing the ability to deliver a sensible, sustainable plan with local support, is what the community is not willing to see happen.

3.8 The Draft Local Plan purports to safeguard the aims of the 2011 APB, but offers no guidance as to whether or how this can be achieved in light of the proposal for a large secondary school. There can, as a matter of substance, be no consultation on a matter so abstract to the extent it is inconceivable. Contrast this with the 2011 APB consultation which included a series of questionnaires and presentations on the back of four alternative concrete land-use and density proposals, and it is apparent how this purported consultation falls short of legal requirements, including the legitimate expectation of the same this time around – which cannot take place if the Local Plan is adopted in its present form. The Council is in any event under a duty to co-operate with the local community in formulating a Local Plan, but cannot for the last twelve months be said to have done anything other than disregard, and even frustrate, the well-voiced views of the community.

4. RESIDENTIAL HOUSING

4.1 Representation 3 relates to residential housing capacity. The Local Plan does not address residential housing capacity on the Site. There is an opportunity to give the developer a clear steer on this and, consequently, on what space is available for other commercial and community uses.

4.2 The Draft Local Plan does, however, expressly adopt the 2011 APB, which made a number of conclusions as to housing densities and site layout – for instance, to keep taller buildings to the existing footprint and to ensure buildings at the north-western part of the Site do not exceed two-to-three stories.

4.3 Furthermore, the Council, in its responses to earlier consultation rounds, re-affirmed the latest Authority's Monitoring Report on Housing, which provided for an estimate of 200 to 300 dwellings in total.

4.4 The Council is invited to expressly re-affirm these limits, subject to downward revision to the extent necessary to accommodate any change the Council requires from a primary school to a secondary school. If there is ultimately a secondary school, any reduction in space must come from residential housing (pro rata across affordable and other housing).

5. PLAYING FIELDS

5.1 Representation 4 relates to the reference in the Draft Local Plan to the 'reprovision' of the playing fields. Re-

provision is undefined, and unexplained, but (i) appears impossible to achieve on the Site and (ii) if that is the case, is akin to removal of the playing fields. This despite the 2011 APB expressly committing to protect them.

5.2 There are a number of issues with this. Perhaps first and foremost, they are a valued green space where green spaces are of a premium. Ask Barnes Eagles football club who use them for home games. Or Thomson House school whose pupils do not otherwise have access to playing fields. Or any number of local residents who look on to or pass them frequently. They also have historical importance – England’s only World Cup winning football team I understand trained there. And not to mention that they are home to a variety of flora and fauna which interact with local and riverside eco-systems.

5.3 From a procedural perspective, there are also a number of further issues this raises: (a) there is a pending application for Local Green Space designation, which the Local Plan should be acknowledging and expressly accepting; (b) trees on the playing fields are the subject of one or more tree preservation orders; (c) key users have not been consulted, including Sport England and Barnes Eagles football club; and (d) this is a green field space, which the National Policy Planning Framework seeks to require local authorities to protect in Local Plans.

6. CONCLUSION

6.1 There remains a fantastic opportunity to develop the Site in accordance with the aims of the 2011 APB. My understanding is that that plan, including the indicative site plan from the 2011 APB, would continue to be supported by a significant majority of local stakeholders for whom this is a significant issue. That plan was and should remain the ‘Plan A’, which will deliver sustainable development for Mortlake and the wider Richmond Borough.

6.2 Residents entirely recognise that the Council faces competing demands requiring an analysis of complex facts and difficult decisions – although they would like to see evidence that the Council has properly undertaken that analysis. They even acknowledge that – in some shape or form – secondary education places will be required in the Borough at some point over the medium to long term. However, that does not mean we should collectively accept what is quite clearly a sub-optimal solution here when one gets into the detail. It is using a sledgehammer to crack a nut. And it most certainly does not mean that sub-optimal solutions should be accepted where due process and the principles of natural justice and legitimate expectation have not been followed.

190	288	Sarah Hoad, Transport for London	SA 24 Stag Brewery, Lower Richmond Road, Mortlake						<p>This letter follows receipt of the notification that the London Borough of Richmond has undertaken consultation on the publication version of the proposed Local Plan. The following provides relevant updates and commentary on the proposed wording where appropriate, which follows previous consultation in January 2016 and July 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.</i></p> <p>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. The GLA letter makes reference to the need to have regard to TfL's specific comments in respect of transport and infrastructure.</p> <p>SA24, Stag Brewery, Lower Richmond Road, Mortlake Ongoing collaboration with TfL is welcomed for A316 and A205 access and network impact in order to assess the impact and agree mitigation measures through development.</p>	Comments noted. No changes required.
199	140	Graham Kench	SA 24 Stag Brewery, Lower Richmond Road, Mortlake	No	Yes	Yes			<p>I have read and fully endorse the comments submitted by the Mortlake Brewery Community Group in relation to the Development Brief, The Secondary School, The Sports Fields, The Housing Development and the Overall Development.</p> <p>As a resident for over 30 years I am concerned at the additional traffic and reduction in air quality that these proposals are likely to cause. Lower Richmond Road SW14 between Sheen Lane and Chalker's Corner is already heavily congested especially heading west to Chalker's Corner.</p> <p>This must be one of the busiest junctions in London with over 20 lanes of traffic and seven sets of traffic lights. There are always tailbacks at each set of traffic lights with vehicles stopping, idling, moving forward and stopping again - the most significant activities for the emission of nitrogen dioxide (NO2) and particulates. Very often the traffic on the Lower Richmond Road is tailed back to Sheen Lane and beyond. Recent research has highlighted a link between NO2 and particulate emissions and lung problems and dementia amongst people or working within 50 metres of a main road. Most at risk are children under</p>	See Officer response to Comment ID 45 above.

										the age of 18 who are inclined to suffer poor lung development.	
166	191	Henrike Mueller	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							I am writing to let you know that I support the construction of a secondary school on the brewery site in Mortlake. With young children living in the area I am conscious that the area is underserved with good secondary schools.	Comments noted. Support welcomed.
235	66	Peter Eaton	SA 24 Stag Brewery, Lower Richmond Road, Mortlake		No	No		Yes		<p>Background</p> <p>This site was the specific subject of a very intense and prolonged consultation process from 2009 to 2010, instigated by the Local Authority prior to the Brewery closure. As a result a draft Planning Brief for the site was issued in 2010 to which I personally contributed comments and observations with Philip Wealthy who headed up consultations with the local community. I also made comments and observations on the draft as a member of the Mortlake Brewery Community Group (MBCG), an umbrella group formed to channel views for local residents and local associations, clubs etc.</p> <p>The outcome was the Adopted Supplementary Planning Document - Stag Brewery, Mortlake, SW14 - Planning Brief - adopted by the Council in July 2011. This remains the brief and guide to the site's future re-development.</p> <p>During 2010 the Council also held parallel postal survey consultations to inform the process - "All in One, Your Mortlake" and a borough-wide "My Richmond Villages", and one of the overwhelming aspects which the public raised was that; - "open spaces were considered to be the most important aspect in making your area a good place to live" - (78%).</p> <p>Secondary School</p> <p>The summary statement for the Brewery site SA 24 now includes a change of proposal from primary school in the Adopted Brief to "an on-site new 6-form entry secondary school, plus sixth form". This is a major change with huge impact in respect of, land take, scale, massing, traffic generation and would indeed constitute a 'large scale destination use' - a use whole-heartedly rejected by the community in the initial 'Options' stage of local consultations in 2008/2009/2010.</p> <p>The switch to a secondary school was proposed and agreed by Council Cabinet in late 2015 without due process of community engagement or consultation. This use combined with residential use and other commercial uses, included in the Brief and Publication Local Plan, would put quite unacceptable pressure on the local road network. This would also locate a school close to increased pollution levels on the local highways - Lower Richmond Road / Mortlake High St.</p> <p>I can understand the need for improved education provisions - primary and secondary, but the case for a</p>	See Officer response to Comment ID 45 above.

secondary school specifically allocated for this site is by no means proven nor indeed justified. Cabinet's decision in October 2015 was made without due consultation and indeed alternative solutions to satisfy secondary places/provisions have not been explored as far as the community is aware. This appears to be an opportunistic site selection process which is challengeable. My concern and thus objection to this proposal in the Publication Local Plan is that any secondary provision on the Stag site, in order to be of high quality, comparable with other secondary schools and to provide adequate external recreation/sports areas, will require a site area of circa 3 to 4.0Ha in total. This would occupy almost half of the 8.6Ha site and create a complete in-balance in relation to the broader vision for the site. It would also risk satisfying all of the other various agreed objectives for this unique site, which is a once in a life-time opportunity to create an exemplar development and put a village heart back into the Mortlake community.

There may indeed be a need for secondary provision "in the area" as noted on bullet point 4 but it does not automatically follow that is necessarily on the Stag site. I have been party to proposing an alternative location on the Barn Elms site which has been submitted to senior planning representative at the Council. I am of the view that a primary school would be appropriate on this site, but do not agree with the draft as proposed. The Stag site offers a better primary school location than that proposed in SA 28 - Barnes Hospital, which would suffer from very poor, restricted width, vehicular access on South Worple Way, and would be very close indeed to the three other existing primary schools (Barnes Primary, St Mary Magdalen's and Thomson House).

Furthermore the vendor of the Stag Brewery land purchased the site based upon the provision of the primary school and the Adopted Brief and will thus be naturally pressured to develop based upon their original development strategy and density aspirations, which will potentially dilute/erode and be at conflict with the Council's other wider objectives for the site - (see Sections 1.1 to 1.6 of the Adopted Brief for the site).

Open Spaces - The Sports Fields

All previous consultation, and also the Adopted Brief call for retention and indeed improvement of the existing open space on the western part of the Stag site. It is also proposed that new open space is created linking Mortlake Green to the riverside, helping to create the location for a Community Hub and heart to Mortlake.

- The sports fields have never been built upon and when attached to Cromwell House and were known as Cromwell Meadows

- They were used as allotments during WW2
- In 1966 they were used by the England football team for training and practice in preparation prior to winning the World Cup
- The sports fields have been consistently used by local clubs for many years
- The sports fields are designated as "Other Open Land of Townspace Importance" (DM OS3)
- The Adopted Planning Brief for the Stag site considered relocation of this space but the Council's and the public's conclusion was - "that it must be retained in this location, and made more accessible for public use" - see Clause 2.43.
- See also E- Open Space - Clause 5.38 and (DM OS8) - These seek to protect the visual impact and character of the open land.

Clearly the Council have now; influenced no doubt by the switch from primary provision to secondary, softened their approach to the status of the existing open space. The Publication Local Plan now proposes the possibility of "re-provision" of the playing fields. This I object to most strongly. The bullet points in SA24 must include the retention of the existing sports fields and accord with the adopted brief and the long consultation process which led to agreement on retention of the sports fields in the present position - certainly NOT re-provision or re-distribution. It should be made crystal clear that Para 5.3.6 of Policy LP14 does not over-ride the adopted brief for the Stag site in this particular respect.

As a member of the MBCG I have been privy to emerging plans being prepared by the developer. Early schemes retained the playing fields as required in the adopted brief, but the Council's switch to the secondary school has we believe led to new proposals to build on the fields and also create hard-surface areas and MUGA's which would destroy the character of this currently protected OOLOTI, and would conflict with all contained in the Stag site adopted brief and other Policy clauses such as LP14 and LP31.

Residential Development

The Adopted Planning Brief for the Stag site does not quote residential mix nor total number of units, only height, layout, bulk and massing limits. The Local Plan is silent on residential unit numbers in SA24.

I do support the total residential provisions in Section 9 housing Policy LP34, but would strongly object to any site density above the guidance in GLA's Supplementary Guidance on Density (2016).

We have heard that the developer's emerging plans are proposing 850 apartments and 200 sheltered units - 1050 in total, plus residential units in upper floors of the

238	22	Francine Bates & Russell Campbe II	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>Background.</p> <p>This site was the specific subject of a very intensive and prolonged consultation process from 2009 to 2010, instigated by the Local Authority prior to the Brewery closure. As a result a draft Planning Brief for the site was issued in 2010 to which Our colleague Peter Eaton personally contributed comments and observations with Philip Wealthy who headed up consultations with the local community. He also made comments and observations on the draft as a member of the Mortlake Brewery Community Group,(MBCG), an umbrella group formed to channel views for local residents and local associations, clubs etc.</p> <p>The outcome was the Adopted Supplementary Planning Document – Stag Brewery, Mortlake,SW14 – Planning Brief – adopted by the Council in July 2011. This remains the brief and guide to the site’s future re-development. During 2010 the Council also held parallel postal survey consultations to inform the process – “ All in One , Your Mortlake” and a borough-wide “ My Richmond Villages”, and one of the overwhelming aspects which the public raised was that; -“ open spaces were considered to be the most important aspect in making your area a good place to live” – (78%).</p> <p>Secondary School - SA 24</p> <p>The summary statement for the Brewery site SA 24 now includes a change of proposal from primary school in the Adopted Brief to “an on-site new 6-form entry secondary school, plus sixth form”. This is a major change with huge impact in respect of, land take, scale, massing, traffic generation and would indeed constitute a ‘large scale destination use’ - a use whole-heartedly rejected by the community in the initial ‘Options’ stage of local consultations in 2008/2009/2010.</p> <p>The switch to a secondary school was proposed and agreed by Council Cabinet in late 2015 without due process of community engagement or consultation. This use combined with residential use and other commercial uses, included in the Brief and Publication Local Plan, would put quite unacceptable pressures on the local road network. This would also locate a school close to increased pollution levels on the local highways – Lower Richmond Road /Mortlake High St.</p> <p>We can understand the need for improved education provisions – primary and secondary, but the case for a secondary school specifically allocated for this site is by no means proven nor indeed justified. Cabinet’s decision in October 2015 was made without due consultation and indeed alternative solutions to satisfy secondary places/provisions have not been explored as far as the</p>		See Officer response to Comment ID 45 above.
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There may indeed be a need for secondary provision'' in the area'' as noted on bullet point 4 but it does not automatically follow that is necessarily on the Stag site. We have been party to proposing an alternative location on the Barn Elms site which has been submitted to senior planning representatives at the Council. Our view is that a primary school would be appropriate on this site, but we do not agree with the draft as proposed. The Stag site offers a better primary school location than that proposed in SA. 28 – Barnes Hospital , which would suffer from very poor, restricted width, vehicular access on South Worple Way, and would be very close indeed to three other existing primary schools.(Barnes Primary, St Mary Magdalen's and Thomson House).

Furthermore the vendor of the Stag Brewery land purchased the site based upon the provision of the primary school and the Adopted Brief and will thus be naturally pressured to develop based upon their original development strategy and density aspirations, which will potentially dilute/erode and be at conflict with the Council's other wider objectives for the site - (see Sections 1.1 to 1.6 of the Adopted Brief for the site).

Open Spaces - The Sports Fields - SA24

All previous consultation, and also the Adopted Planning Brief call for retention and indeed improvement of the existing open space on the western part of the Stag site. It is also proposed that new open space is created linking Mortlake Green to the riverside, helping to create the location for a Community Hub and heart to Mortlake.

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Clearly the Council have now, influenced no doubt by the switch from primary provision to secondary, softened their approach to the status of the existing open space. The Publication Local Plan now proposes the possibility of “re-provision” of the playing fields. This we object. The bullet points in SA24 must include the retention of the existing sports fields and accord with the adopted brief and the long consultation process which led to agreement on retention of the sports fields in the present position - certainly NOT re-provision or re-distribution. It should be made crystal clear that Para 5.3.6 of Policy LP14 does not over-ride the adopted brief for the Stag site in this particular respect.

As members of the MBCG we have been made aware of emerging plans being prepared by the developer. Early schemes retained the playing fields as required in the adopted brief, but the Council’s switch to the secondary school has we believe led to new proposals to build on the fields and also create hard-surface areas and MUGA’s which would destroy the character of this currently protected OOLOTI, and would conflict with all contained in the Stag site adopted brief and other Policy clauses such as LP14 and LP31.

Residential Development SA24 and LP34

The Adopted Planning Brief for the Stag site does not quote residential mix nor total numbers of units, only height, layout, bulk and massing limits. The Local Plan is silent on residential unit numbers in SA24.

We do support the total residential provisions in Section 9 housing Policy LP34, but would strongly object to any site density above the guidance in the GLA’s Supplementary Guidance on Density (2016).

We have heard that the developer’s emerging plans are proposing 850 apartments and 200 sheltered units – 1050 in total, plus residential units in upper floors of the Maltings building. This combined with the secondary school would be a cumulative over-development when combined with other mixed and employment uses

included in the Adopted brief.
We support the limit to 400-500 units in the East Sheen, Mortlake, Barnes Common and Barnes area – LP34.

Bus Services Bullet point 11 - SA24
If the Avondale Rd bus stopping/turning facility was located on the Stag site it must involve retention of the existing sports fields/open space. We doubt whether this relocation would be possible, and indeed appropriate if combined with the mix of uses proposed and a primary or secondary provision. The more logical proposal given the increase in population with the Stag site redevelopment would be 209 services extending beyond the Lower Richmond Road, preferably as far as the existing terminal/turning in Richmond. Such extended services would reduce local vehicular trips and alleviate traffic on the local network. This ought to be positively explored with TFL. The first sentence in bullet point 11 should therefore be removed, and the second sentence retained.

General SA 24.
• We would support the other aspects of the SA 24 proposals and bullet points.
• All aspects and Clauses of the Adopted Planning Brief for the Stag site should remain as currently adopted July 2011 - no clauses in the Local Plan should conflict or contradict with the Adopted Brief for the Stag

241	18	Ben Mackworth-Praed, Barnes Community Association Environment Group	SA 24 Stag Brewery, Lower Richmond Road, Mortlake	No	No		Yes	Yes	Yes	Yes	<p>The Local Plan appears not to be compliant with the SPD Stag Brewery, Mortlake, SW14, Planning Brief in four major respects. We have not had any firm details from the Developers but information released so far indicates that:</p> <ol style="list-style-type: none"> 1. The density is likely to be much higher at over 1000 units than the maximum of 560 considered in the Brief. 2. This will have an unsustainable effect on traffic movements through Barnes. 3. There is now a requirement for a secondary school on the site. 4. This is likely to take up nearly twice the space required for the primary school originally envisaged, and together with the increased number of units proposed will severely impact on the existing historic Playing Field and probably also on the proposal to extend Mortlake Green down to the river which was a central plank of all four proposals in 2011. <p>The cumulative effect of the above changes, which have not had the consultation given to the original proposals, will be to produce an unsustainable mass of housing with no centre and no thought given to the very real capabilities of this site. What was done to Mortlake High Street by the soulless blocks of flats that destroyed its south side will be compounded by the inevitable consequences of allowing the developers to increase the number of units proposed above those thought proper in 2011. The Council should stick to its guns; The SPD was available to the developers at the time of purchase. Their plans should be based on it.</p>	<p>The Council should insist that the number of units to be built do not exceed those allowed for in the SPD. They should also remove the requirement for a secondary school; the space available is too small and the traffic connections too poor. A proper consultation should be held once the Developers' proposals are known.</p>	<p>See Officer response to Comment ID 45 above.</p> <p>As and when a planning application is submitted, members of the public will be able to comment on the application through the usual means.</p>
365	113	Katharine Fletcher, Historic England	SA 24 Stag Brewery, Lower Richmond Road, Mortlake								<p>See Publication Local Plan Comment IDs 340 and 350.</p>	<p>A new bullet point is needed highlighting that the site lies within an APA and that policy LP 7 applies. (See Appendix 8 to this document for the schedule of GLAAS comments)</p>	<p>Comments noted. The Council considers that it is not helpful to state that a particular policy would apply, such as LP7, because the assumption is that all policies within the Local Plan and other related adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan. This is also specifically stated within paragraph 12.1.6 of the Local Plan to avoid the need for cross-references.</p>

393	127	Katie Hyson	SA 24 Stag Brewery, Lower Richmond Road, Mortlake	No	No	No	Yes	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.</p> <p>Except as follows, I endorse the views expressed by Mortlake Brewery Community Group in its representation(s).</p> <p>Also endorse Mr & Mrs Millington's response - see Publication Local Plan Comment IDs 367, 368, 369, 370, 371, 372, 373, 374, 376, 377, 378, 379 and Sustainability Appraisal Comment ID 16.</p>	<p>Amend as follows, (i) replacing references to the secondary school with a primary school of the type approved in the 2011 adopted supplementary planning brief for the site and (ii) removing the reference to the 'reprovision' of the playing fields.</p> <p>Suggested amended text 8.2.11 Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan: Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form of entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school</p> <p>13.1.7 13.1.7 A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population. Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses: Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form of entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school</p> <p>SA 24 Stag Brewery, Lower Richmond Road, Mortlake The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 2-form entry primary school, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure</p>	<p>See Officer response to Comment ID 42 above.</p> <p>In addition, it should be noted that Other Open Land of Townscape Importance (OOLTI) has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. The OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances. However, it should be noted that any such reprovision would have to be on this site and not off-site or elsewhere in the Mortlake area.</p> <p>To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. <u><i>This includes the retention and/or reprovision and upgrading of the playing field within the site.</i></u>"</p> <p>It is considered that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. Policies need to be sufficiently flexible, for example to take account of changing market conditions, as well as deliverable, and therefore they should not be too</p>
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achieved through conversion of common land or parkland, which will be contentious views in the.

MESS comments on Pre-Publication Local Plan, August 2016 - Planning brief for site needs to be re-adopted due to the change from primary to secondary school and the whole site is now within a Conservation Area.

Council's response to MESS comments, January 2017 - The Council does not consider it necessary to redo the planning brief for this site as the change from the primary to the secondary school can be addressed as part of the Local Plan. Also note that the Local Plan is subject to a minimum of three rounds public consultation, and the change from a primary to a secondary school was included in the consultation on the scope of the review of the policies early 2016, as well as in the consultation on the draft Plan in the summer 2016.

MESS comments on Publication Local Plan, February 2017 - Noted that the reference to the planning brief, which was originally the 11th bullet, is now the 1st bullet, which is as it should be.

Noted that bullets now make reference to the site being partially within the Mortlake Conservation Area and to buildings to the north of the site being Grade II listed. This is incorrect – the Mortlake Village Plan shows the site as wholly within the Mortlake Conservation Area.

MESS comments on Pre-Publication Local Plan, August 2016 - Have the Council considered Barn Elms instead for locating a secondary school at that site? It could be a very special circumstance in MOL on Barn Elms.

Council's response to MESS comments, January 2017 - The Council disagrees that Barn Elms, which is designated MOL, would provide a more sustainable location for development.

MESS comments on Publication Local Plan, February 2017 - MESS's proposal for locating the secondary school at Barn Elms is the subject of a separate submission by MBCG.

MESS comments on Pre-Publication Local Plan, August 2016 - Affordable housing in brackets suggests it might not happen – need to change this.

Council's response to MESS comments, January 2017 - The reference to affordable housing is consistent throughout the Plan's site allocations.

MESS comments on Publication Local Plan, February 2017 - Not a satisfactory answer. MESS still believes that affordable housing in brackets suggests it might not happen and would be in conflict with New Policy LP36 above.

											<p>MESS comments on Pre-Publication Local Plan, August 2016 - Bullet points do not cover heights of buildings and density of development including its traffic impact on Lower Richmond Road, given the Chalke's Corner junction and Sheen Lane level crossing present serious constraints to any increase in traffic capacity.</p> <p>Council's response to MESS comments, January 2017 - Heights of buildings and density are covered in other policies of the plan. Traffic impact is covered above.</p> <p>MESS comments on Publication Local Plan, February 2017 - Noted. MESS is concerned that the redevelopment of the Brewery will exceed acceptable height limits and the relevant density range taking into account the London Plan Density Matrix (mentioned in New Policy LP34 above) given that a significant part of the site will be occupied by a 6-form entry plus 6th form secondary school.</p> <p>MESS comments on Pre-Publication Local Plan, August 2016 - Concerns about poor PTAL level and traffic/congestion.</p> <p>Council's response to MESS comments, January 2017 - Any redevelopment proposal will require a full Transport Assessment, as part of which surveys will need to be carried out to ensure there are not demonstrably negative impacts on the wider area and residents' amenity.</p> <p>MESS comments on Publication Local Plan, February 2017 - Noted, but MESS cannot believe there will be no demonstrably negative impacts on the wider community and residents' amenity.</p>	
343	278	Saime Tanzi	SA 24 Stag Brewery, Lower Richmond Road, Mortlake	No	No						<p><i>Endorse Mr & Mrs Millington's response - see Publication Local Plan Comment IDs 367, 368, 369, 370, 371, 372, 373, 374, 376, 377, 378, 379 and Sustainability Appraisal Comment ID 16</i></p>	See Officer response to Comment IDs 367, 368, 369, 370, 371, 372, 373, 374, 376, 377, 378, 379 and Sustainability Appraisal Comment ID 16

373	181	Max & Emma Millington	SA 24 Stag Brewery, Lower Richmond Road, Mortlake <i>This is referred to as comment 2D out of a set of twelve representations.</i> Rep 2D - Changes in the Draft Local Plan affecting the 2011 APB must be consulted upon, in the same way the 2011 APB itself was consulted upon prior to adoption.	No	No	No	Yes	Yes	Yes	Yes	<p><i>See also Appendix 13 to this document comprising summary letter, extract from marketing of site plan, full set of representations and previous comments.</i></p> <p><u>Rep 2D - Changes in the Draft Local Plan affecting the 2011 APB must be consulted upon, in the same way the 2011 APB itself was consulted upon prior to adoption.</u></p> <p><u>Draft Local Plan provisions:</u> "Secondary Educational Uses"</p> <p>The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) states that 'The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required'. It also states that 'Appropriate uses, in addition to educational, include...'. Bullet point 4 below that box goes on to state that 'There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.'</p> <p>2011 APB Bullet point 1 below that box states 'The Council has produced and adopted a development brief in 2011 for the site, which sets out the vision for redevelopment and provides guidance on the site's characteristics, constraints, land use and development opportunities.'</p> <p><u>Issue:</u> The 2011 APB was formulated on the back of a detailed and thorough consultation process. That process determined that a <u>primary</u> school was an appropriate use of the site in all the circumstances, should the site ever become available. It went on to recommend an appropriate site allocation and position. Participants of the 2011 APB process expressly discounted the appropriateness of a secondary school on the site. A change to the 2011 APB, of such material significance – both specifically to overturn a point on which a conclusion has been reached in the 2011 APB and on the overall site plan - must be consulted upon in the same way as the original 2011 APB before it can take effect: failure to do so would undermine the consultation process to such an extent as to render it futile and undermine principles of natural justice, as well as the legitimate expectation of the community to expect a full and proper detailed consultation.</p>	<p><u>Detail:</u> The 2011 APB contemplated the provision, in the location and of the size set out in Appendix A thereto, of a two-form entry primary school.</p> <p>A detailed consultation process, on the back of myriad studies, preceded the adoption of the 2011 APB. The 2011 APB therefore represented the considered views of experts and key stakeholders: whilst its conclusions were not shared by all, it represented a balanced view of what would create a deliverable, desirable and sustainable new village heart for Mortlake. That process expressly concluded that a primary school was to be preferred over a secondary school. It also took into account the need for some new residential allocation to make the project viable – albeit on a substantially low density basis – and included a variety of other uses set out in the Draft Local Plan.</p> <p>This was the Council's and local stakeholders' collective vision as to what would deliver the primary objective just five years ago. Inherent in that exercise, and the selection and allocation of the non-educational uses, was and is a recognition (i) that the site is of a finite size – allowing more space for one use will inevitably restrict available space for another use – and (ii) that those selections and allocations will have consequences in other areas, beyond site allocations, which must properly be taken into account. The 2011 APB therefore included a range of uses representing a considered compromise.</p> <p>The Draft Local Plan, in stark contrast to the 2011 APB, now seeks to adopt the Secondary Educational Purposes alongside the other uses it recommends. Moreover, it does so in a manner which purports to give precedence to the Secondary Educational Purposes.</p> <p>This is not simply a case of swapping one word: primary for secondary. The changes expressly overturn the conclusions of the 2011 APB on a specific point of material importance to participating stakeholders – sufficiently material that the summary of views collated during the process make express reference to the inclusion of a primary school in place of a secondary school.</p> <p>Further, when one considers the consequences of including the Secondary Educational Uses on the site, one must quickly conclude that the entire Draft Local Plan is unachievable and unsustainable by reason of its inclusion. Please refer to my representations 2A to 2C for further explanation in this regard. And yet the Council purports to make this decision without any consultation of the type conducted in producing the 2011 APB, which the Draft Local Plan otherwise seeks to uphold.</p> <p>This, it must be said, runs contrary to the Council's own stated approach in January 2016, where I was personally advised by a planning officer that: "<i>The report to Cabinet stated that the <u>planning brief</u>, adopted in July 2011, was</i></p>	See the Officer response to Comment ID 45 and Comment ID 195 above
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subject to full statutory consultation with local residents and all requisite stakeholders in 2009 and 2010. Cabinet agreed at its meeting in October 2015 an updated School Place Planning Strategy and it highlighted the implications for educational needs in the borough, in particular for the Stag Brewery site. However, the Cabinet decision has not amended the agreed planning brief, and if the Council were to update/revise the brief, a public consultation would need to be carried out."

This seems eminently sensible But is not, on my reading of the legislation and supporting materials, the correct interpretation. In principle, the Local Plan can override a supplemental planning brief. The reason this can be allowed to pass, is because the legislation contemplates that the Local Plan will be developed in accordance with the acts and the National Planning Policy Framework, which necessitate the impact of the Local Plan to be worked through in great detail, on the basis of sustainable plans, and with the benefit of proportionate evidence. None of these are available at present: this is simply a 'pie-in-the sky' addition to address a perceived shortfall in secondary education places.

So the conclusion must be one of two things: Either:

(i) the Council is right – and there must be a detailed consultation at local level, with proper evidence, to amend the 2011 APB, and until this takes place the Local Plan must be expressed to be subject to the outcome of that exercise; or

(ii) as I think is the better reading of the various legislation, to include provision of a secondary school on the Site in the Local Plan requires consultation and formulation in accordance with the acts and the National Planning Policy Framework, which necessitate the impact of the Local Plan to be worked through in great detail, on the basis of sustainable plans, and with the benefit of proportionate evidence. The supplementary planning brief, or amendments to the existing 2011 APB, would then be done within the framework of the adopted Local Plan. But the Local Plan cannot legally be adopted in its present form as a result of the matters stated above.

Any purported exercise of powers by the Council to the contrary, would be ultra vires.

376	181	Max & Emma Millington	SA 24 Stag Brewery, Lower Richmond Road, Mortlake <i>This is referred to as comment 3 out of a set of twelve representations.</i> Rep 3: Plans for housing insufficiently detailed	No	No	No	Yes	Yes	Yes	Yes	<p>See also Appendix 13 to this document comprising summary letter, extract from marketing of site plan, full set of representations and previous comments.</p> <p>Rep 3: Plans for housing insufficiently detailed</p> <p><u>Draft Local Plan provisions:</u></p> <p>“Residential Uses”</p> <p>The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) states that</p> <p>‘The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. ... Appropriate uses ... include residential (including affordable housing)...’</p> <p>‘The provision of residential uses (including affordable housing), will ensure that the new village heart becomes a vibrant centre for new communities.’</p> <p>‘Guidance on design and local character for the area is also set out in the Mortlake Village Planning Guidance SPD’</p> <p>“Other Uses”</p> <p>The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) provides for ‘a new village heart and centre for Mortlake’. It goes on to provide for a variety of intended uses, including education, employment, health, community and social infrastructure facilities, sport and leisure uses. It also indicates that ‘high quality open spaces and public realm’ should be incorporated.</p> <p>Bullet point 1 below the that box states ‘The Council has produced and adopted a development brief in 2011 for the site, which sets out the vision for redevelopment and provides guidance on the site’s characteristics, constraints, land use and development opportunities.’</p> <p><u>Issue:</u> Notwithstanding formal adoption at Local Plan level of the 2011 APB in this regard, the Council is invited to provide clarity to the developer on the nature and density of residential housing which it will consider appropriate, based on the consultation exercise and conclusions which gave rise to the 2011 APB, but taking into account the proposed revision to require provision of a large secondary school and sixth form. Allocation to Residential Uses must not undermine the commitment to delivery of the Other Uses.</p>	<p><u>Detail:</u> The 2011 APB contemplated the provision, in the locations set out in Appendix A thereto, a variety of residential provision, with indicative acceptable densities. A detailed consultation process, on the back of a myriad of studies, preceded the adoption of the 2011 APB. The 2011 APB therefore represented the considered views of experts and key stakeholders: whilst its conclusions were not shared by all, it represented a balanced view of what would create a deliverable, desirable and sustainable new village heart for Mortlake. That process expressly concluded that the scheme should generally be low density, rising to medium density towards the middle of the Site.</p> <p>The plan appended to the 2011 APB ‘indicates maximum heights that would generally be acceptable on the site and these reflect the planning benefits being sought. A mix of heights across the site will be required to reflect and relate to the existing urban grain and scale. Housing on the north western zone should be lower density with heights up to 3 storeys relating to existing residential and of generally 3-4 stories around the playing fields and create a new street emulating the character of buildings of townscape merit on the Lower Richmond Road. [This could also refer to the Trinity Mews Development now in place.] ...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.’ This position must be maintained. Whilst it stopped short of stipulating a number of dwellings that would be appropriate, in the Council questionnaire which proceeded it, the community came down heavily in favour of the mixed-use, lower density residential scheme of, from recollection, 390 dwellings. The Council has removed this document from its website since the commencement of the consultation process. The Council has, however, in its Council’s latest Authority Monitoring Report on Housing (2014/15, page 18), provided for a range of 200 to 300 new dwellings.</p> <p>The Council is invited to re-affirm in the Local Plan that, save as follows, planning applications for the Site should propose no more than 200 to 300 dwellings (and certainly no more than 390). The Council acknowledged this in its responses to representations made in relation to the draft Local Plan made available in summer 2016.</p> <p>That number should be subject to downward revision should the Council persist with the idea of a secondary school of c. 1,400 people instead of a primary school of c. 400 people. The Council should be explicit on this point in the Local Plan. To the extent any deviation is otherwise considered appropriate, it should be demonstrably justified with reference to a change in law since the 2011 APB was</p>	See the Officer response to Comment ID 45 and Comment ID 195 above.
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												proposal has been included: it is certainly not at the request of local residents and users of the facility.	consistent with this. 4. 'Reduce or mitigate environmental impacts and pollution levels (such as air, noise, light, odour, fumes water and soil) and encourage improvements in air quality, particularly along major roads and areas that already exceed acceptable air quality standards.': replacing green open space with a use that will add vehicular traffic to an area which already suffers from unsafe emissions levels, some of the highest in the Borough, is clearly at odds with this. 5. 'Ensure local environmental impacts of development are not detrimental to the health, safety and the amenity of existing and new users or occupiers of a development or the surrounding area.': removing the green space would negatively impact the amenity of local residents and users of the space, and may for the reasons set out above negatively impact health. 11. 'Create attractive and pleasant environments and spaces that promote active and healthy lifestyles, including recognising their benefits to residents' social life and their economic benefits to the borough's centres.': removing green space used for sports is not conducive to achieving this objective. Accordingly, the reference to 'and/or re-provision' must be deleted and the playing fields should be expressly be afforded the protection which the 2011 APB sought to afford the playing fields
368	181	Max & Emma Millington	SA 24 Stag Brewery, Lower Richmond Road, Mortlake <i>This is referred to as comment 1A out of a set of twelve representations.</i> Rep 1A - Non-compliance with National Planning Policy Framework: re-provision of playing fields	No	No	No	Yes	Yes	Yes	Yes	<p>See also Appendix 13 to this document comprising summary letter, extract from marketing of site plan, full set of representations and previous comments.</p> <p>Rep 1A - Non-compliance with National Planning Policy Framework: re-provision of playing fields</p> <p>Draft Local Plan provisions:</p> <p>The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) refers to 'the retention and/or re-provision and upgrading of the playing field'.</p> <p>Issue: 'Reprovision' is undefined. However, any strategy which removes the playing fields from the Site altogether would be inconsistent with the requirements and policies of the National Planning Policy Framework.</p> <p>Detail: The playing fields represent a significant portion of the site, measuring approximately two hectares. For reference, refer to page 5 of the following site marketing document (copyright acknowledged): https://www.geraldeve.com/wp-content/uploads/2015/08/Stag-Brewery-Mortlake-Brochure.pdf</p> <p>They house two playing fields. Those playing fields are enjoyed by many local residents and sports groups (such as Barnes Eagles) for sports activities, as well as affording residents an attractive green space. Other organisations also use the space during the week: for instance, they are</p>	<p>Local Green Space designation</p> <p>In order to formalise that protection, an application has been made by letter dated on or about 14 February 2017 to designate the playing fields as a Local Green Space pursuant to the National Planning Policy Framework. There appears to be a prima facie strong case for the playing fields to receive that designation, for the reasons set out in the letter.</p> <p>As per section 1.1.5 of the Draft Local Plan, and at paragraph 76 of the NPPF, councils must take into account the National Planning Policy Framework when formulating the Local Plan; by designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. As such, if that application is successful, as it is expected to be, it would not be possible to re-provide for the playing fields elsewhere. The reference to 'and/or re-provision' must be deleted (or made subject to the pending Local Green Space application) to avoid direct conflict with the requirements of the NPPF. As per section 1.1.5 of the Draft Local Plan, and at paragraph 76 of the NPPF, councils must take into account the National Planning Policy Framework when formulating the Local Plan; by designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. As such, if that application is successful, as it is expected to be, it would not be possible to</p>	See the Officer response to Comment ID 45 and Comment ID 195 above. In addition, see the Officer response to Comment ID 259 in relation to the application for the Local Green Space designation.

used by the local primary school (Thomson House) which does not have a playing field and by the police to train dogs.

The playing fields have been a green space, special for many reasons, for as long as any local residents can remember.

At the north- western, north-eastern and southern boundaries of the playing fields a number of trees. Those trees are, I understand, the subject of a tree preservation order, details of which can be provided on request by Mortlake Brewery Community Group.

As well as being used by local residents, the playing fields are also home to a wide variety of animals, including foxes, parakeets and storks.

Indeed, such is the importance of the playing fields to the Site and the local area, that the Council saw fit, after a full statutory consultation process, to protect them for generations to come when adopting the 2011 APB.

The Draft Local Plan, in seeking to include 'reprovision', could be construed as reversing that protection. The Council has offered no explanation for the basis on which that would be consistent with the requirements of the NPPF, or the overarching principles stated in the Draft Local Plan.

re-provide for the playing fields elsewhere. The reference to 'and/or re-provision' must be deleted (or made subject to the pending Local Green Space application) to avoid direct conflict with the requirements of the NPPF.

Community engagement

Para. 150 of the NPPF provides that, '*Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities.*'

It continues, at para. 155 of the NPPF '*Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.*'

The NPPF finally goes on to state, at para. 157, '*Crucially, Local Plans should ... be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations.*'

The Council has failed to engage with, and take in to due (if any) account, the clearly expressed views of the local community. Not only do the Council's consultation materials offer no evidence as to community support for the proposal to remove or re-provision the playing fields, they disregard: (i) the conclusions of the statutory consultation process which resulted in the adoption of the 2011 APB, which was that the playing fields should be retained and protected; and (ii) frequently and strongly expressed views by residents of properties adjacent to the playing fields and local representative groups, such as the Mortlake Brewery Community Group.

Furthermore, I understand (but have not verified) that Barnes Eagles football club and Sport England feel strongly on this issue, but have not been approached by the Council for consultation.

Impact on environment: impact on air quality

Para. 154 of the NPPF requires Local Plans to be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.

It continues to state, at para. 156, that '*Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to develop.. climate change mitigation and adaptation,*

conservation and enhancement of the natural and historic environment, including landscape.'

Para. 157 states, 'Crucially, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and sup

Para. 109 states that, '*The planning system should contribute to and enhance the natural and local environment by ... 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*'.

Further, at para. 110, it states: '*In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.*'

The playing fields are situated immediately adjacent to the Lower Richmond Road. Recent studies showed that this particular area, especially at Chalker's Corner (approx. 0.3km away), suffers from being one of the worst areas in London for air pollution.

Furthermore, it was identified as being a Council 'Air Quality Focus Area', such was the acknowledged poor level of air pollution and the potential for improvement.

The proposed 'reprovision' of the playing fields is strongly at odds with the Council's duties under the NPPF for two reasons. First, it by removing the playing fields, and the trees on that part of the Site, there will be a removal of the vegetation that mitigates the harmful effects of vehicular transport. Furthermore, and more significantly, the Council plans are widely expected to propose the establishment of a secondary school which will inevitably bring a further 1,400 people daily along this stretch of road and consequently slow other traffic in the area.

Does the Council seriously intend to site a secondary school for the Borough's children, and its staff, to both of whom they owe a duty of care, in the midst of a known pollution hotspot, which will become materially worse, when other options exist? If they do so, they do so with blood on their hands and a stream of litigation to follow for years to come,

for which the Council, and individual Councillors, will be held responsible. But for present purposes, to do so would be an incontrovertible breach of para. 109 of the NPPF.

Impact on environment: failure to protect green space / impact on natural environment

The aforementioned provisions of paragraphs 154, 156, 157, 109 and 110 are equally of relevant here.

Furthermore, para. 100 of the NPPF states that: *'The planning system should contribute to and enhance the natural and local environment by:*

- *protecting and enhancing valued landscapes, geological conservation interests and soils;*
- *recognising the wider benefits of ecosystem services;*
- *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;...*

Para. 111 then states that, *'Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.'*

The playing fields are a greenfield site, and of high environmental importance. Planning policy must not seek to require development of such a site.

Further, to do so would prejudice the local eco-systems, which interact with those of the river just c.100m away.

To the contrary, the Local Plan should be actively seeking to promote the conservation of such sites. Accordingly, the Draft Local Plan should be amended to expressly provide for the protection of the playing fields.

369	181	Max & Emma Millington	SA 24 Stag Brewery, Lower Richmond Road, Mortlake This is referred to as comment 1B out of a set of twelve representations. Rep 1B - Non-compliance with National Planning Policy Framework: impact of requiring six-form entry, plus sixth form, secondary school	No	No	No	Yes	Yes	Yes	Yes	<p>See also Appendix (13) to this document comprising summary letter, extract from marketing of site plan, full set of representations and previous comments.</p> <p>Rep 1B - Non-compliance with National Planning Policy Framework: impact of requiring six-form entry, plus sixth form, secondary school</p> <p>“Secondary Educational Uses”</p> <p>The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) states that ‘The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required’. It also states that ‘Appropriate uses, in addition to educational, include...’.</p> <p>Bullet point 4 below that box goes on to state that ‘There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council’s School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.’</p> <p>“Other Uses”</p> <p>The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) provides for ‘a new village heart and centre for Mortlake’. It goes on to provide for a variety of intended uses, including residential, employment, health, community and social infrastructure facilities, sport and leisure uses. It also indicates that ‘high quality open spaces and public realm’ should be incorporated.</p> <p>Bullet point 1 below the that box states ‘The Council has produced and adopted a development brief in 2011 for the site, which sets out the vision for redevelopment and provides guidance on the site’s characteristics, constraints, land use and development opportunities.’</p> <p><u>Issue:</u></p> <p>In providing for the requirement of a new six-form entry, plus sixth form, secondary school to be included on the Site, due account has not been taken of the requirements and policies comprised in the National Planning Policy Framework.</p> <p><u>Detail:</u></p> <p>The 2011 APB contemplated the provision, in the location set out in Appendix A thereto, of a two-form entry primary school. The Draft Local Plan, directly and indirectly through reference to the Council’s School Place Planning Strategy and the Mortlake Village Planning Guidance SPD, seeks to replace that primary school (without consultation) with a secondary school.</p> <p>A detailed consultation process, on the back of a myriad of studies, preceded the adoption of the 2011 APB. The 2011 APB therefore represented the considered views of experts and key stakeholders: whilst its conclusions were not shared by all, it represented a balanced view of what</p>	<p>Draft Local Plan is insufficiently clear</p> <p>Para. 154 requires that ‘Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.’</p> <p>Allied to the considerations set out under ‘Material impediment to achieving sustainable development’ set out above, the Council seeks in the Draft Local Plan:</p> <p>(i) on the one hand, to require that the Secondary Education Uses be incorporated; yet</p> <p>(ii) on the other hand, to provide an over-arching aim of creating a new village heart for Mortlake through promoting a multi-use site incorporating the Other Uses and safeguarding the 2011 APB conclusions.</p> <p>For the reasons set out in other representations, it is firstly highly doubtful that this can be successfully achieved at all, and second offers no guidance to a decision maker as to how this could or should be achieved in a development proposal. It is entirely unrealistic. It becomes all the more unrealistic when the consequences of a requirement for a secondary school are considered further: these are subject to further studies and analyses which will, one suspects, demonstrate firstly that a secondary school is not in fact or law ‘clearly’ required on the Site (as the Draft Local Plan suggests) and second that including it will, when considered in tandem with the new housing required to make the development viable, result in legal /safe recommended levels of air pollution being exceeded and/or Local Green Space designations and/or tree preservation orders being breached.</p> <p>The requirement for a secondary school on the Site must be struck out.</p> <p>Preference for secondary school over primary school</p> <p>There is nothing in the NPPF which requires the Council to prioritise secondary education over sustainable development, or primary education.</p> <p>To the contrary – express mention is made (at para. 38) to ensuring that in large-scale developments, such as the present one ‘Where practical, ..., key facilities <u>such as primary schools and local shops should be located within walking distance of most properties.</u>’ The Council is expressly seeking to remove the primary school, required by the 2011 APB, from the Site.</p> <p>Inappropriate use of additional development plan documents</p>	See the Officer response to Comment ID 45 and Comment ID 195 above.
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would create a deliverable, desirable and sustainable new village heart for Mortlake. That process expressly concluded that a primary school was to be preferred over a secondary school. It also took into account the need for some new residential allocation to make the project viable – albeit on a substantially low density basis – and included a variety of uses of the type included in the Other Uses set out in the Draft Local Plan.

This was the Council's and local stakeholders' collective vision as to what would deliver the primary objective just five years ago. Inherent in that exercise, and the selection and allocation of the Other Uses, was and is a recognition (i) that the site is of a finite size – allowing more space for one use will inevitably restrict available space for another use – and (ii) that those selections and allocations will have consequences in other areas, beyond site allocations, which must properly be taken into account. The 2011 APB therefore included a range of uses representing a considered compromise.

For further discussion of these choices and their consequences, please refer to representations 2 A to D. The Draft Local Plan, in stark contrast to the 2011 APB, now seeks to adopt the Secondary Educational Purposes alongside (and to the inevitable detriment of) the Other Uses. It appears, however, to retain the same overriding objective.

Community engagement

Para. 150 of the NPPF provides that, *'Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities.'*

It continues, at para. 155 of the NPPF *'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.'*

The NPPF finally goes on to state, at para. 157, *'Crucially, Local Plans should ... be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations.'*

The Council has failed to engage with, and take in to due (if any) account, the clearly expressed views of the local community. Not only do the Council's consultation materials offer no evidence as to community support for the proposal to require the Site to house a large secondary school and to remove or re-provision the playing fields, they disregard:

Para. 153 states *'Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.'*

The School Planning Place Strategy, referenced in the Mortlake Village Plan and the Draft Local Plan, de facto constitutes an additional development plan document. That is the document through which the Cabinet of the Council, purported to take the decision in 2015, without consultation, to replace the viable scheme including a primary school, with the scheme containing a secondary school (and possibly very little else).

The need to usurp the existing scheme set out in the 2011 APB (itself a supplementary planning document) with a secondary education requirement is far from clearly made out for the reasons discussed at length in representations 2E to G.

Without undermining any one of those points, it is worth noting that:

(i) that decision focussed solely on supply and demand needs for the eastern part of the Borough, not the suitability, viability or sustainability of the Site as the right place to satisfy the perceived shortfall – it also expressly acknowledged the need to undertake further studies as pre-conditions to the Site being accepted as the correct site for a secondary school, none of which I am aware have to date taken place;

(ii) contrary to para. 158, no proportionate evidence base of the impact of that decision was made, not least on the Other Uses; and

(iii) that decision, alongside some twelve other matters under consideration, appears from the minutes to have been taken in just seventeen minutes, suggesting procedural irregularities, or at least a failure to take due account of all relevant factors and/or giving undue weight to an irrelevant or immaterial factor.

The above-referenced documents must therefore be disregarded in formulating planning policy, save to the (very limited) extent they offer evidence of a matter that is itself worthy of consideration in due course (but not for the purpose of the Local Plan).

Impact on environment: impact on air quality

Para. 154 of the NPPF requires Local Plans to be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans

(i) the conclusions of the statutory consultation process which resulted in the adoption of the 2011 APB, which was that a primary school should be preferred to a secondary school and that the playing fields should be retained and protected – they also reflected broad support for the Other Uses which would be jeopardised by the requirement for a large secondary school; and (ii) frequently and strongly expressed views by residents of properties adjacent to the Site and local representative groups, such as the Mortlake Brewery Community Group.

Material impediment to achieving sustainable development

Para. 151 of the NPPF provides that, ‘Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.’

Para. 152. goes on to state, ‘Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered.’

The Other Uses comprised in the 2011 APB represent the culmination of detailed analyses of what could realistically be sustained on the Site for the benefit of local stakeholders. Documentation relating to the adoption of the plan provides many example of this. To select a few, it provided for:

- the construction of new housing (including affordable housing);
- new businesses of a type in-keeping with the local area and thus the creation of new jobs – especially relevant in view of the job losses stemming from the closure of the brewery;
- the provision of retail, leisure (including a new boat museum) and other commercial development;
- the provision of infrastructure for transport (including a potential relocation of Mortlake bus interchange) and the enhancement of the River Thames borders;
- a requirement for appropriate provision of local infrastructure and facilities (including a new primary school); and
- the protection of and enhancement of existing green spaces and landscape, such as Mortlake Green and the playing fields.

should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.

It continues to state, at para. 156, that ‘Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to develop.. climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.’

Para. 157 states, ‘Crucially, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and sup

Para. 109 states that, ‘The planning system should contribute to and enhance the natural and local environment by ... 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’.

Further, at para. 110, it states: ‘In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.’

The Site borders, for the full extent of its southern end, the Lower Richmond Road. Recent studies showed that this particular area, especially at Chalker’s Corner (approx. 0.3km away from the south-western point of the Site), suffers from being one of the worst areas in London for air pollution. Furthermore, it was identified as being a Council ‘Air Quality Focus Area’, such was the poor level of air pollution and the potential for improvement.

The proposed requirement for the Secondary Educational Purposes is strongly at odds with the Council’s duties under the NPPF for two reasons. First, by removing the playing fields, and the trees on that part of the Site, there will be a removal of the vegetation that mitigates the harmful effects of vehicular transport. Furthermore, and more significantly, the Council plans are widely expected to propose the

												<p>These all correspond to the strategic priorities contemplated by para. 156 of the NPPF and combine economic, social and environmental gains, with a view to providing a new village heart for Mortlake.</p> <p>A draft site allocations plan was formulated (set out at Appendix A to the 2011 APB) to demonstrate how these competing demands could all be accommodated.</p> <p>The Council, through the Draft Local Plan, now seeks to tear up that NPPF-compliant plan entirely by seeking to include, and even prioritise, the Secondary Educational Uses on the Site.</p> <p>To be clear: this is not a ‘minor tweak’ which could be accommodated within the 2011 APB which was consulted upon: an area of the site allocated to accommodate 400 primary school children and staff will be replaced – somewhere on the Site - by buildings required to house 1,400 secondary school children and staff. This could effectively render redundant the entire scheme promulgated by the 2011 APB, which the Local Plan otherwise purports to safeguard. And other aspects will inevitably suffer. The Council has offered no evidence to the contrary. Indeed, the Council has offered no evidence of having properly considered the consequences of promoting the Secondary Educational Uses on sustainable development of the area at all.</p> <p>The clear consequence of this is that the Other Uses will inevitably, and disproportionately, be prejudiced. And, significantly, the plan will no longer be compliance with the requirements of paragraphs 151, 152 and 156 of the NPPF.</p>	<p>establishment of a secondary school which will inevitable bring a further 1,400 people daily along this stretch of road. There is no way to accommodate this number of daily visitors to the Site without materially and prejudicially impacting air quality levels at a site which is already incontrovertibly one of the worst in London.</p> <p>Impact on playing fields</p> <p>For specific discussion around the impact of the inclusion of a secondary school on the site of the playing fields, please refer to separate representation 1A.</p>
370	181	Max & Emma Millington	SA 24 Stag Brewery, Lower Richmond Road, Mortlake <i>This is referred to as comment 2A out of a set of twelve representation.</i> Rep 2A - Requirement for secondary educational use renders overriding objective and other uses very difficult, if not impossible, to achieve.	No	No	No	Yes	Yes	Yes	Yes	<p><i>See also Appendix 13 to this document comprising summary letter, extract from marketing of site plan, full set of representations and previous comments.</i></p> <p><i>Rep 2A - Requirement for secondary educational use renders overriding objective and other uses very difficult, if not impossible, to achieve.</i></p> <p><u>Draft Local Plan provisions:</u> “Secondary Educational Uses” The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) states that ‘The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required’. It also states that ‘Appropriate uses, in addition to educational, include...’.</p> <p>Bullet point 4 below that box goes on to state that ‘There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council’s School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.’</p> <p>“Other Uses” The box at the start of SA24 (Stag Brewery, Lower</p>	<p><u>Detail:</u> The 2011 APB contemplated the provision, in the location set out in Appendix A thereto, of a two-form entry primary school. The Draft Local Plan, directly and indirectly through reference to the Council’s School Place Planning Strategy and the Mortlake Village Planning Guidance SPD, seeks to replace that primary school (without consultation) with a secondary school.</p> <p>A detailed consultation process, on the back of a myriad of studies, preceded the adoption of the 2011 APB. The 2011 APB therefore represented the considered views of experts and key stakeholders: whilst its conclusions were not shared by all, it represented a balanced view of what would create a deliverable, desirable and sustainable new village heart for Mortlake. That process expressly concluded that a primary school was to be preferred over a secondary school. It also took into account the need for some new residential allocation to make the project viable – albeit on a substantially low density basis – and included a variety of uses of the type included in the Other Uses set out in the Draft Local Plan.</p> <p>This was the Council’s and local stakeholders’ collective</p>	See the Officer response to Comment ID 45 and Comment ID 195 above.

Richmond Road, Mortlake) provides for 'a new village heart and centre for Mortlake'. It goes on to provide for a variety of intended uses, including residential, employment, health, community and social infrastructure facilities, sport and leisure uses. It also indicates that 'high quality open spaces and public realm' should be incorporated.

Bullet point 1 below the that box states 'The Council has produced and adopted a development brief in 2011 for the site, which sets out the vision for redevelopment and provides guidance on the site's characteristics, constraints, land use and development opportunities.'

Issue: To give effect to the Secondary Educational Uses on the site will render the Other Uses impossible to implement. This includes the stated overriding objective for the site, which has since 2010 been to create a new village heart for Mortlake. It cannot be the intention of applicable planning legislation and policies for one single use – opposed by local stakeholders – to have 'backdoor' primacy in this way: the entire exercise would be futile and all references to the Other Uses would be redundant. The Council has yet to produce any plan or study showing the feasibility of the Other Uses if the Secondary Educational Uses are pursued. The Draft Local Plan text should be amended as set out in the following section of these representations.

vision as to what would deliver the primary objective just five years ago. Inherent in that exercise, and the selection and allocation of the Other Uses, was and is a recognition (i) that the site is of a finite size – allowing more space for one use will inevitably restrict available space for another use – and (ii) that those selections and allocations will have consequences in other areas, beyond site allocations, which must properly be taken into account. The 2011 APB therefore included a range of uses representing a considered compromise.

The Draft Local Plan, in stark contrast to the 2011 APB, now seeks to adopt the Secondary Educational Purposes alongside the Other Uses. It appears, however, to retain the same overriding objective.

In order to deliver that overriding objective, it appears inconceivable that the Secondary Educational Purposes could be included, and even be given priority over the Other Uses (as appears to be the case by stating this the Secondary Educational Purpose 'will be required' and that the Other Uses are, 'in addition to educational').

In assessing this, one must look at the characteristics of a six-form entry, plus sixth form, secondary school, and then consider the impact that will have. (Something the Council appears to have failed to do).

First, in terms of numbers. I would estimate circa 1,300 pupils, being seven years multiplied by 30 pupils multiplied by six forms. Teaching staff, specialist staff – such as music and sports, canteen staff, management, contractors and maintenance staff - would typically be expected to amount to between 60 and 200. That means one must be looking at around 1,350 to 1,500 people attending the site on a daily basis – possibly more, for instance visiting school children attending for sports events.

By way of context, the village of Mortlake presently has approximately 2,000 residents I am told. So this would be a huge impact on existing daily people flows.

One must also consider the size of the site allocation for such a school. This is not set in stone. I attended a school of marginally fewer pupils (c.1,080), with a site size bigger than the entire Site. If the Council were to construct a school based on educational norm design standards for the most compact school contemplated – and do taxpayers and the electorate really want to settle for the bare minimum in the Borough, or should we be aiming higher? – that would require a site size of about 1.5 to 2 hectares. But that disregards parking space and spaces for buses and other transport to park and turn around. So the true site requirement will be significantly bigger – a minimum of 2.5 to 3 hectares would seem reasonable.

The overall Site amounts to 8.6 hectares, of which significantly less is built upon and should thus provide the

maximum footprint for any new development. In contrast, a primary school built on the same basis and of the type contemplated by the 2011 APB would require 0.5 to 0.75 hectares.

So the space available for allocation to elements critical to a sustainable development (housing (including affordable), commercial, social, green spaces) would need to shrink by a minimum of 2 hectares. Or by a third. And probably more in practice.

The relevance of this is very simple: including a six-form entry, plus sixth form, secondary school on the site will have a significant, and potentially fatal, impact on the deliverability of the overriding objective for the site and the Other Uses which local stakeholders value have repeatedly, over many years, asked the Council to commit to include in the Local Plan.

Will the housing requirements be decreased commensurately? From 390 dwellings approved at the time of the 2011 consultation (or 200 to 300 as per the Council's latest Authority Monitoring Report on Housing 2014/15, page 18), to say 100 now, of which 40 to 50 affordable? That would hardly be consistent with national and London planning guidance.

Finally, and taking a step back, the stated overriding objective is to deliver a new village heart for Mortlake. It forms part of the Village Plan. No village would surely ever be planned to incorporate a school of the size of school of this nature and size. The Local Plan for Mortlake simply cannot conceivably be delivered in its present form if the Council retains the six-form entry, and sixth form, secondary school.

If you were to ask the man on the Clapham omnibus what they would want to see in a village, be that in terms of what a village requires to be desirable, to function sustainably, or to be attractive – they surely would not opt for a secondary school, let alone one of this size. The Draft Local Plan speaks of vibrancy: what is vibrant about an enclosed, private concrete jungle, that will be closed evenings and weekends, serving pupils who commute in from outside of the local area?

This must not be allowed to proceed.

If it were the Council's intention no longer to pursue the objective of a new village heart for Mortlake incorporating the Other Uses, the Council would be duty bound to have consulted from the start on that basis to enable due representations to be made - and the proposal to be overturned on any one of a number of bases. The Draft Local Plan therefore additionally suffers from procedural inadequacies in this regard.

371	181	Max & Emma Millington	SA 24 Stag Brewery, Lower Richmond Road, Mortlake <i>This is referred to as comment 2B out of a set of twelve representations.</i> Rep 2B - Primacy of secondary educational use over other uses: disproportionate impact	No	No	No	Yes	Yes	Yes	Yes	<p>See also Appendix (13) to this document comprising summary letter, extract from marketing of site plan, full set of representations and previous comments.</p> <p>Rep 2B - Primacy of secondary educational use over other uses: disproportionate impact</p> <p>Draft Local Plan provisions: "Secondary Educational Uses" The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) states that 'The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required'. It also states that 'Appropriate uses, in addition to educational, include...'. Bullet point 4 below that box goes on to state that 'There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.' "Other Uses" The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) provides for 'a new village heart and centre for Mortlake'. It goes on to provide for a variety of intended uses, including residential, employment, health, community and social infrastructure facilities, sport and leisure uses. It also indicates that 'high quality open spaces and public realm' should be incorporated. Bullet point 1 below the that box states 'The Council has produced and adopted a development brief in 2011 for the site, which sets out the vision for redevelopment and provides guidance on the site's characteristics, constraints, land use and development opportunities.' Issue: By seeking to promote the Secondary Educational Uses as it does, the Draft Local Plan disproportionately seeks to deliver one design feature / use over all others, to the disproportionate detriment of those other uses, to the extent it impacts delivery of the overriding objective for the site as stated in the 2011 APB and the present Draft Local Plan: to create a new village heart for Mortlake.</p>	<p>Detail: The 2011 APB contemplated the provision, in the location set out in Appendix A thereto, of a two-form entry primary school. The Draft Local Plan, directly and indirectly through reference to the Council's School Place Planning Strategy and the Mortlake Village Planning Guidance SPD, seeks to replace that primary school (without consultation) with a secondary school. A detailed consultation process, on the back of a myriad of studies, preceded the adoption of the 2011 APB. The 2011 APB therefore represented the considered views of experts and key stakeholders: whilst its conclusions were not shared by all, it represented a balanced view of what would create a deliverable, desirable and sustainable new village heart for Mortlake. That process expressly concluded that a primary school was to be preferred over a secondary school. It also took into account the need for some new residential allocation to make the project viable – albeit on a substantially low density basis – and included a variety of uses of the type included in the Other Uses set out in the Draft Local Plan. This was the Council's and local stakeholders' collective vision as to what would deliver the primary objective just five years ago. Inherent in that exercise, and the selection and allocation of the Other Uses, was and is a recognition (i) that the site is of a finite size – allowing more space for one use will inevitably restrict available space for another use – and (ii) that those selections and allocations will have consequences in other areas, beyond site allocations, which must properly be taken into account. The 2011 APB therefore included a range of uses representing a considered compromise. The Draft Local Plan, in stark contrast to the 2011 APB, now seeks to adopt the Secondary Educational Purposes alongside the Other Uses. It appears, however, to retain the same overriding objective. In order to deliver that overriding objective, it appears inconceivable that the Secondary Educational Purposes could be included, and even be given priority over the Other Uses (as appears to be the case by stating this the Secondary Educational Purpose 'will be required' and that the Other Uses are, 'in addition to educational'. In assessing this, one must look at the characteristics of a six-form entry, plus sixth form, secondary school, and then consider the impact that will have. (Something the Council appears to have failed to do). First, in terms of numbers. I would estimate circa 1,300 pupils, being seven years multiplied by 30 pupils multiplied by six forms. Teaching staff, specialist staff – such as music and sports, canteen staff, management, contractors and maintenance staff - would typically be expected to amount</p>	See the Officer response to Comment ID 45 and Comment ID 195 above.
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to between 60 and 200. That means one must be looking at around 1,350 to 1,500 people attending the site on a daily basis – possibly more, for instance visiting school children attending for sports events.

By way of context, the village of Mortlake presently has approximately 2,000 residents I am told. So this would be a huge impact on existing daily people flows.

One must also consider the size of the site allocation for such a school. This is not set in stone. I attended a school of marginally fewer pupils (c.1,080), with a site size bigger than the entire Site. If the Council were to construct a school based on educational norm design standards for the most compact school contemplated – and do taxpayers and the electorate really want to settle for the bare minimum in the Borough, or should we be aiming higher? – that would require a site size of about 1.5 to 2 hectares. But that disregards parking space and spaces for buses and other transport to park and turn around. So the true site requirement will be significantly bigger – a minimum range of 2.5 to 3.5 hectares could be envisaged.

The overall Site amounts to 8.6 hectares, of which significantly less is built upon and should thus provide the maximum footprint for any new development. In contrast, a primary school built on the same basis and of the type contemplated by the 2011 APB would require 0.5 to 0.75 hectares.

So the space available for allocation to elements critical to a sustainable development (housing (including affordable), commercial, social, green spaces) would need to shrink by a minimum of 2 hectares. Or by a third. And probably more in practice.

The relevance of this is very simple: including a six-form entry, plus sixth form, secondary school on the site will have a significant, and potentially fatal, impact on the deliverability of the overriding objective for the site and the Other Uses which local stakeholders value and have repeatedly, over many years, asked the Council to commit to include in the Local Plan. In other words, the inclusion of this particular use is entirely disproportionate in that it will not enable any other benefits from the opportunity to be delivered.

As mentioned above, the 2011 APB also considered the consequences of the site allocations. One reason for including a primary school rather than a secondary school on the site would doubtless have been because of its smaller space. But it was more than that: there was a recognition that having to accommodate an additional 1,000 people on, and coming to and from, the site (approximately 1,400 as opposed to 400 with a primary school) on a daily basis was simply not feasible. The site is of finite size. Local spaces and facilities are of a limited size and capacity.

Finally, and taking a step back, the stated overriding objective is to deliver a new village heart for Mortlake. It forms part of the Village Plan. No village would surely ever be planned to incorporate a school of the size of school of this nature and size. The Local Plan for Mortlake simply cannot conceivably be delivered in its present form if the Council retains the six-form entry, and sixth form, secondary school, such is its size and impact on the site. If you were to ask the man on the Clapham omnibus what they would want to see in a village, be that in terms of what a village requires to be desirable, to function sustainably, or to be attractive – they surely would not opt for a secondary school, let alone one of this size. The Draft Local Plan speaks of vibrancy: what is vibrant about an enclosed, private concrete jungle, that will be closed evenings and weekends, serving pupils from outside of the local area?

Thus, to allow the Draft Local Plan to be approved in its present form, would disproportionately prejudice the delivery of any other uses, disproportionately prejudice the local stakeholders seeking to benefit from those other uses; and would disproportionately impact the lives of local stakeholders. All because, in formulating the Draft Local Plan and School Place Planning Strategy, disproportionate weight has been placed on the need for the Secondary Educational Uses in the area and the appropriateness of the Site to meet that need.

And in any event, if it were the Council's intention no longer to pursue the objective of a new village heart for Mortlake incorporating the Other Uses, the Council would be duty bound to have consulted from the start on that basis to enable due representations to be made - and the proposal to be overturned on any one of a number of bases. The Draft Local Plan therefore additionally suffers from procedural inadequacies in this regard.

374	181	Max & Emma Millington	SA 24 Stag Brewery, Lower Richmond Road, Mortlake <i>This is referred to as comment 2E out of a set of twelve representations.</i> Rep 2E – The statement that ‘There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council’s School Place Planning Strategy.’ is unsupported, and unsupportable, in fact and law.	No	No	No	Yes	Yes	Yes	Yes	<p>See also Appendix 13 to this document comprising summary letter, extract from marketing of site plan, full set of representations and previous comments.</p> <p>Rep 2E – The statement that ‘There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council’s School Place Planning Strategy.’ is unsupported, and unsupportable, in fact and law.</p> <p><u>Draft local plan provisions</u></p> <p>The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) states that ‘<u>The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required</u>’.</p> <p>Bullet point 4 below that box goes on to state that ‘<u>There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council’s School Place Planning Strategy.</u>’ Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.’</p> <p>The 2011 APD contemplated the provision, in the location set out in Appendix A to the brief, of a two-form entry primary school. The Draft Local Plan, directly and indirectly through reference to the Council’s School Place Planning Strategy and the Mortlake Village Planning Guidance SPD, seeks to replace that primary school with a secondary school.</p> <p><u>Issue:</u> The statement that ‘<i>There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council’s School Place Planning Strategy.</i>’ is unsupported. This is the case, in particular, because the Council’s School Place Planning Strategy makes and relies on errors of fact and law which are being inappropriately ‘rubber-stamped’ into a statutory planning document. In contrast, there remains a demonstrable need in this area for primary education provision.</p>	<p><u>Detail:</u> The Draft Local Plan does not set out on the basis on which the words ‘need’ or ‘in this area’ are to be construed. There are a number of ways to assess these terms. However, I think it is common ground with the Council that an ‘area’ in this context is the Borough and accordingly the ‘need’ is for the Council to discharge its duties under Section 14 of the Education Act 1996, as amended, which provides to the effect that the Council has a duty to provide sufficient places or primary and secondary education for its residents. Subsection 2 states that, “<i>The schools available for an area shall not be regarded as sufficient for the purposes of subsection (1) unless they are sufficient in number, character and equipment to provide for all pupils the opportunity of appropriate education</i>”..</p> <p>I shall return to the requirements of Section 14, and what they do and do not require properly to be taken into account. However, the first point to note is that the Local Plan should more explicitly state what the Council intends to say: i.e. ‘The Council considers there is a need ...in the Borough and, in accordance with the conclusions of the Council’s School Place Planning Strategy, the Council has determined that SA24 is the optimal location for it.’</p> <p>There consequently becomes two issues:</p> <p>(a) firstly, is there in fact and law a requirement for a six-form entry, plus sixth form, school in the Borough; and</p> <p>(b) second, is the Council’s determination that SA24 is the optimal location for it a reasonable one, which it is entitled to reach in the performance of its duties. Accordingly, there are both procedural and substantive issues at stake.</p> <p><i>This representation continues for six pages and has not been replicated in full here - See Appendix (13) for the full comments on Rep 2E.</i></p>	See the Officer response to Comment ID 42 above.
372	181	Max & Emma Millington	SA 24 Stag Brewery, Lower Richmond Road, Mortlake <i>This is referred to as comment 2C out of a set of twelve representations.</i> Rep 2C - Primacy of secondary educational use over other uses: failure to consider consequences	No	No	No	Yes	Yes	Yes	Yes	<p>See also Appendix (13) to this document comprising summary letter, extract from marketing of site plan, full set of representations and previous comments.</p> <p>Rep 2C - Primacy of secondary educational use over other uses: failure to consider consequences</p> <p><u>Draft Local Plan provisions:</u></p> <p>“Secondary Educational Uses”</p> <p>The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) states that ‘The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required’. It also states that ‘Appropriate uses, in addition to educational, include...’.</p> <p>Bullet point 4 below that box goes on to state that ‘There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area as set out in the Council’s School Place Planning Strategy. Therefore, the Council</p>	<p><u>Detail:</u></p> <p>The 2011 APB contemplated the provision, in the location set out in Appendix A thereto, of a two-form entry primary school. The Draft Local Plan, directly and indirectly through reference to the Council’s School Place Planning Strategy and the Mortlake Village Planning Guidance SPD, seeks to replace that primary school (without consultation) with a secondary school.</p> <p>A detailed consultation process, on the back of a myriad of studies, preceded the adoption of the 2011 APB. The 2011 APB therefore represented the considered views of experts and key stakeholders: whilst its conclusions were not shared by all, it represented a balanced view of what would create a deliverable, desirable and sustainable new village heart for Mortlake. That process expressly concluded that a primary school was to be preferred over a secondary school. It also</p>	See the Officer response to Comment ID 45 and Comment ID 195 above.

expects any redevelopment proposal to allow for the provision of this school.'

"Other Uses"

The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) provides for 'a new village heart and centre for Mortlake'. It goes on to provide for a variety of intended uses, including residential, employment, health, community and social infrastructure facilities, sport and leisure uses. It also indicates that 'high quality open spaces and public realm' should be incorporated.

Bullet point 1 below the that box states 'The Council has produced and adopted a development brief in 2011 for the site, which sets out the vision for redevelopment and provides guidance on the site's characteristics, constraints, land use and development opportunities.'

Issue: By seeking to promote the Secondary Educational Uses as it does, the Draft Local Plan will have a material impact on the deliverability of the Local Plan, on the sustainability of the development and the wider area, and on the local community. These consequences have not been duly considered by the Council. Or, if they have been considered, an undue importance has been attributed to the need for a secondary school over the consequences of that allocation, leading to an unreasonable, or irrational, decision to continue to promote it.

took into account the need for some new residential allocation to make the project viable – albeit on a substantially low density basis – and included a variety of uses of the type included in the Other Uses set out in the Draft Local Plan.

This was the Council's and local stakeholders' collective vision as to what would deliver the primary objective just five years ago. Inherent in that exercise, and the selection and allocation of the Other Uses, was and is a recognition (i) that the site is of a finite size – allowing more space for one use will inevitably restrict available space for another use – and (ii) that those selections and allocations will have consequences in other areas, beyond site allocations, which must properly be taken into account. The 2011 APB therefore included a range of uses representing a considered compromise.

The Draft Local Plan, in stark contrast to the 2011 APB, now seeks to adopt the Secondary Educational Purposes alongside the Other Uses. It appears, however, to retain the same overriding objective.

In order to deliver that overriding objective, it appears inconceivable that the Secondary Educational Purposes could be included, and even be given priority over the Other Uses (as appears to be the case by stating this the Secondary Educational Purpose 'will be required' and that the Other Uses are, 'in addition to educational').

In assessing this, one must look at the characteristics of a six-form entry, plus sixth form, secondary school, and then consider the impact that will have. (Something the Council appears to have failed to do).

First, in terms of numbers. I would estimate circa 1,300 pupils, being seven years multiplied by 30 pupils multiplied by six forms. Teaching staff, specialist staff – such as music and sports, canteen staff, management, contractors and maintenance staff - would typically be expected to amount to between 60 and 200. That means one must be looking at around 1,350 to 1,500 people attending the site on a daily basis – possibly more, for instance visiting school children attending for sports events.

By way of context, the village of Mortlake presently has approximately 2,000 residents I am told. So this would be a huge impact on existing daily people flows.

One must also consider the size of the site allocation for such a school. This is not set in stone. I attended a school of marginally fewer pupils (c.1,080), with a site size bigger than the entire Site. If the Council were to construct a school based on educational norm design standards for the most compact school contemplated – and do taxpayers and the electorate really want to settle for the bare minimum in the Borough, or should we be aiming higher? – that would require a site size of about 1.5 to 2 hectares. But that

disregards parking space and spaces for buses and other transport to park and turn around. So the true site requirement will be significantly bigger – a minimum range of 2.5 to 3.5 hectares could be envisaged.

The overall Site amounts to 8.6 hectares, of which significantly less is built upon and should thus provide the maximum footprint for any new development. In contrast, a primary school built on the same basis and of the type contemplated by the 2011 APB would require 0.5 to 0.75 hectares.

So the space available for allocation to elements critical to a sustainable development (housing (including affordable), commercial, social, green spaces) would need to shrink by a minimum of 2 hectares. Or by a third. And probably more in practice.

Impact on Other Uses

The relevance of this is simple: including a six-form entry, plus sixth form, secondary school on the site will have a significant, and potentially fatal, impact on the deliverability of the overriding objective for the site and the Other Uses which local stakeholders value and have repeatedly, over many years, asked the Council to commit to include in the Local Plan.

Traffic: impact on environment

As mentioned above, a secondary school will bring approximately 1,000 more people per day to the immediate vicinity of the Site, compared to the primary school proposal. Or 1,400 more people per day generally. And that takes no account of the increased number of residents moving around as a consequence of new dwellings.

The Site is situated immediately adjacent to the Lower Richmond Road. For reference, refer to page 5 of the following site marketing document (copyright acknowledged) – that is the road running immediately to the south of the site:

<https://www.geraldeve.com/wp-content/uploads/2015/08/Stag-Brewery-Mortlake-Brochure.pdf>

Recent studies showed that this particular area, especially at Chalker’s Corner (approx. 0.3km away), suffers from being one of the worst areas in London for air pollution. There is ample local data to support this. I understand it exceeds legal or recommended safe limits in relation to the presence of noxious gases.

Furthermore, it was identified as being a Council ‘Air Quality Focus Area’, such was the acknowledged poor level of air pollution and the potential for improvement.

The issue is particularly acute because of the geographical layout of the Site: it is bordered to the north by the river, to

the west by Chalker's Corner junction and to the south, approximately 100 meters south of the Lower Richmond Road, by the railway line (which has no tunnel or vehicular bridge). To the east the Lower Richmond Road continues (as Mortlake High Street), as a single-lane highway running through the main Mortlake commercial area.

To cite the Council's Second Implementation Plan: *"The River Thames to the North and the Royal Parks to the South act as barriers to through routes in the Borough, and as a result, high volumes of traffic are being channelled onto a small number of local roads. In particular, the transport network is a particular barrier in the north of the Borough adversely affecting the areas of Sheen, Mortlake and Barnes. Also the River and rail lines cause further difficulties. The severance to local communities caused by the A205 South Circular, the River Thames and railway lines is already a significant issue."*

This means that traffic flows are concentrated in a small area and are consequently very slow at all but the most off-peak times. A school would create traffic flows at already congested peak times.

Whilst clever initiatives may help – such as a tunnel under (or bridges over) the railway line and changing road lay-outs – these will represent improvements to an already inadequate situation but will barely touch on rendering the area suitable for a further thousand daily visitors at the same time.

And to think about the impact on other road-users or including additional crossings on the road to allow people to access the station *en masse* at rush hour...It would be chaos Expert reports should be commissioned to ascertain whether legal or recommended safe limits will be breached: if so, this project simply cannot proceed as currently contemplated. Does the Council seriously intend to site a secondary school for the Borough's children, and its staff, to both of whom they owe a duty of care, in the midst of a known pollution hotspot, which will become materially worse, when other options exist?

There are also already two nursery schools immediately bordering the Site on the Lower Richmond Road: the Council must not knowingly, or recklessly, allow the health of children aged from newborn to 5 years to be harmed in this way.

To do so would be an incontrovertible breach of para. 109 of the NPPF. They would also be doing so with blood on their hands and a stream of litigation to follow for years to come, for which the Council, and individual Councillors, will be held responsible. .

Traffic: impact on journeys

As explained above, traffic levels are already barely tolerable along the Lower Richmond Road, but more widely along

Mortlake High Street, Sheen High Street, at Chalker's Corner, on the A316 and the South Circular. At peak times, it grinds to a standstill.

At a purely local level, it is extremely difficult to exit Williams Lane on to the Lower Richmond Road at peak times. It will become more or less impossible, and unsafe, with additional traffic movements.

It is already a Council priority to improve transport in Mortlake (again as per the Council's Second Implementation Plan) : *"Reducing the need to travel but to make all areas of the Borough and particularly areas of relative disadvantage (Castlenau, Ham, Hampton Nursery Lands, Heathfield, Mortlake and Whitton) accessible by safe, convenient and sustainable transport for all people, including those with disabilities."*

Whilst clever initiatives may help – such as a tunnel under (or bridges over) the railway line and changing road lay-outs – these will represent improvements to an already inadequate situation but will barely touch on rendering the area suitable for a further thousand daily visitors at the same time.

Plus, even if some visitors travel by rail, (i) there is already zero capacity on peak time railway journeys through Mortlake Railway Station, disregarding the impact of any new residential housing and (ii) people will still need to cross roads to get to the school.

There will be no space for a bus lane, so the well-used 419 will become subject to material delays or need to be re-routed – but there is no obvious place to re-route it.

Further, it is likely that improving flows in one place or direction will negatively impact flows in another place or direction. Can the Council really justify negatively impacting congestion on key London roads such as the South Circular and A316, increasing vehicular emissions elsewhere?

Has TfL approved this plan, or even contemplated a way in which it might be feasible and committed to the requisite additional expenditure?

Extra congestion will also jeopardize access for emergency vehicles.

I am all for solutions. But there is no way that any reasonable Council, apprised of all these consequences, and making appropriate investigations, could take the decision to put a sixform entry, plus sixth form, secondary school on the Site. It just will not work. By solving one problem – a perceived need for secondary education facilities – it will be creating many, many more problems, some with profound and lasting consequences on Mortlake and its inhabitants

367	181	Max & Emma Millington	SA 24 Stag Brewery, Lower Richmond Road, Mortlake <i>This is one of a set of twelve representations.</i>	No	No	No	Yes	Yes	Yes	Yes	<p>See also Appendix 13 to this document comprising summary letter, extract from marketing of site plan, full set of representations and previous comments.</p> <p>1. BACKGROUND</p> <p>I am a resident of Williams Lane and live adjacent to the Stag Brewery site. I acquired the property on construction in December 2011, after publication of the 2011 APB referenced below and the public consultation which that followed. I made the purchase in reliance upon those plans, albeit recognising that the final details of any planning consent would need to be ironed out at the relevant time. Significant to this decision was the site of the proposed primary school, given the Borough's extreme shortage of primary education.</p> <p>The location of the Williams Lane and Trinity Mews residences is set out in the Indicative Plan (referred to below) as 'Approved residential development'; the development on Williams Lane and Wadham Mews was completed in 2012 and is referred to in this summary and my representations as the Trinity Mews Development. It can be seen to the north-west of the Site in the picture shown at page 5 here.</p> <p>I have had the benefit of discussing recently the matters raised in this summary with 10 other homeowners on the Trinity Mews Development. I believe the position stated accurately reflects the standpoint of those residents, subject of course to any contrary opinions they may themselves put forward as part of this process, either directly or through the Mortlake Brewery Community Group or any other organisation. Furthermore, the key points made in the representations have also been communicated to the management committee for proprietors and tenants of the c. 63 flats on the Trinity Mews Development. I have received support for the positions stated herein; no-one has opposed it.</p> <p>The presence of the Trinity Mews Development and the views of the Trinity Mews Development residents should properly be taken into account when formulating any revisions to the Site use. The proposed development, if insensitively pursued as appears inevitable from the Draft Local Plan, could blight the lives of the residents both during the construction phase and for years to come.</p> <p>In this summary and the representations, I have used the following terms:</p> <p>(a) "Draft Local Plan" means the 'Council's Local Plan' on which consultation responses are presently sought, found in redline against the previous version at http://www.richmond.gov.uk/combined_local_plan_publication_tracked_changes_of_the_draft_local_plan.pdf; and</p> <p>(b) "Site" means the Stag Brewery site the subject of Site Allocation 24 in the Draft Local Plan'</p>	<p>2.7 The residents of the Trinity Mews Development would like to be in a position to examine these issues against concrete land-use proposals from the developer and/or the Council. The Council has asserted a requirement for a large secondary school, without giving any evidence to the community or (publically) the developer as to how this might be accommodated. The developer's own plans are expected to be made known to the community – despite repeated requests for earlier engagement since the land was acquired – only next month, in March 2017, <u>after</u> the closure of the Local Plan consultation. This is not acceptable. Nonetheless, I can but make these representations on the basis of the facts and generic statements as presently known to me.</p> <p>2.8 Once proper information is provided by the relevant authorities and the developer, we intend to seek expert legal counsel's advice in relation to the processes as conducted to date and, should we be so advised, to pursue one or more claims for judicial review of the Council's decision-making processes and the resultant decisions. We would also strongly recommend the Council either drops the offending provisions of the Local Plan, or at least progresses the Local Plan in the alternative (i.e. with a primary school, retained playing fields and substantially low density housing), until such legal issues are resolved to avoid additional delay to the scheme and cost to taxpayers. We fervently wish to see a sensible plan progress.</p> <p>2.9 Pending this, we expressly reserve all rights and invite the Inspector to take the lead on recognising that what is currently proposed falls a long way short of the procedural steps necessary to incorporate the proposal within the Draft Local Plan but, more importantly, is simply unworkable in its present form.</p> <p>3. REQUIREMENT FOR A SECONDARY SCHOOL ON THE SITE</p> <p>3.1 Representation 2 relates to the 'clear need' (according to the Draft Local Plan) for a large secondary school on the Site. This has certainly not been made out, neither at the time the Cabinet adopted the updated School Place Planning Strategy in 2015, nor subsequently.</p> <p>3.2 The School Place Planning Strategy offers scant insight into how the Cabinet concluded the Site would need to house a large secondary school, plus sixth form. (In fact, it doesn't refer to a sixth form at all – the Draft Local Plan appears to have made that up).</p> <p>3.3 It sets out, based on recent historical demographic information, how there will likely be a need for new places over the course of the medium-to-long term in the eastern part of the Borough.</p> <p>3.4 It then jumps, without analysis, to a conclusion that the Site is the only place a new large secondary school can be accommodated. In so doing, it:</p> <p>(a) disregards the possibility of two or three smaller schools,</p>	<p>See the Officer response to Comment ID 45 and Comment ID 195 above.</p> <p>It is not the purpose of the Local Plan-making process to assess development proposals, such as the one currently being prepared and consulted on by the developers of the Stag Brewery site. The aim of the Local Plan and policy SA 24 is to set out within an adopted development plan a framework for development on this site against which a future planning application will be assessed against.</p>
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(c) “**2011 APB**”, the document entitled ‘Supplementary Planning Document Stag Brewery, Mortlake, SW14 Planning Brief Adopted July 2011’ – found at http://www.richmond.gov.uk/stag_brewery_2010-2.pdf. Finally, I refer to the pre-consultation scoping exercise in relation to the village plans carried out in January 2016, my responses thereto (my **Pre-Consultation Responses**) – accompanying this summary for reference – and your short-form responses on those (**RBC Pre-Consultation Response Comments**).

2. SUMMARY OF POSITION

2.1 In my Pre-Consultation Responses, I reiterated that residents had (literally) bought into the opportunity to create a new village heart for Mortlake. One that would cater for existing and new communities alike, across a range of facilities and uses designed to promote Mortlake to the fullest extent possible. That vision was set out clearly in the 2011 APB.

2.2 I also highlighted a number of issues with the Council’s proposal in late 2015, without public consultation, to establish a six-form entry secondary school, plus sixth form, on the Site instead of the much-needed primary school contemplated by the 2011 APB. I alluded to a number of substantive and procedural issues with these proposals and recommended that further plans incorporate a primary school (as approved in the 2011 APB), at least in the alternative to avoid the Council progressing (at taxpayers’ expense) on the basis of an unworkable, and non-compliant, draft local plan.

2.3 These issues were not properly addressed in the RBC Pre-Consultation Response Comments, nor in the subsequent pre-consultation draft local plan which continued to provide – in abstract terms only – for a large secondary school in place of a primary school. This simply does not work, and there are alternatives.

2.4 The final Draft Local Plan made available in January of this year also now contemplates (for the first time) the ‘reprovision’ of the playing fields that form an intrinsic part of the Site. Those playing fields were expressly protected by the 2011 APB and are of special local and historical importance. There is no commentary in the Draft Local Plan explaining this, however we understand it may be to accommodate the secondary school referred to above. The playing fields must continue to be protected.

2.5 For the reasons that follow, and set out in much further detail in my full representations, I am firmly of the view that the Council has erred, in process and substance, in reaching the conclusions it appears to have reached in formulating SA 24 of the Local Plan for Mortlake. It is not legally compliant and it is unsound.

2.6 I also have material reservations as to whether or not

on different sites, meeting the perceived shortfall in places – it is obvious that the number of sites big enough to accommodate a school for up to 1,500 pupils and staff will be limited, yet the Education Funding Agency’s remit appears to have covered only larger site capacity;

(b) disregards other sites, with *prima facie* better attributes, which are or may become available – why?;

(c) acknowledges the need to consider (i) availability of places outside the Borough and (ii) expansion of existing schools – but then fails to do that: the Local Plan cannot be adopted whilst this further pre-conditional analysis is acknowledged to be outstanding;

(d) disregards the equally pressing need for a primary school in the local area which the 2011 APD provided for;

(e) creates an artificial distinction between the eastern and western parts of the Borough and preventing children travelling an artificial, and in national terms rather short, 6 miles to school – the Education Act 1996, from which the requirement to provide education is derived – makes no such distinction and there are clear, practical reasons to avoid making such a distinction;

(f) crucially, offers no analysis as to the consequences of the decision, principally how it could be delivered alongside the competing requirements of the 2011 APB more generally, but in particular in relation to traffic circulation and access – the Sustainability Appraisal Report is testimony to this; and (g) seems to disregard the fact that emissions of noxious gases adjacent to the Site already exceed legal or recommended safe levels, and that will be exacerbated in any event by the new development: does the Council really want our children, and its staff, to spend the majority of their waking hours in a known pollution hotspot? To do so would be gross negligence, at a minimum.

3.5 In my representations, I identify a number of other legal issues with that decision. But it is worth noting that, according to the minutes of that Cabinet meeting, it lasted just 17 minutes. Just 17 minutes to reach a conclusion of significant local importance and which in essence reverses a key component of the (heavily consulted upon) 2011 APB. And that was 17 minutes in total to resolve not just on this issue, but also some twelve other issues on the agenda that night. If that was truly the case, no wonder such an unworkable proposal was the outcome.

3.6 Notwithstanding the purported adoption by the Cabinet of that policy, it is in any event not appropriate for the Council planning department to ‘rubber-stamp’ the Cabinet decision which was based on primarily on matters of education policy. The Draft Local Plan is a planning document contemplated by statute, the production of which needs to meet a number of procedural and substantive criteria, including under the National Planning Policy

the Council has complied properly with the duty to cooperate. A number of organisations have clear views on the proposal to remove the playing fields, for instance. I would also expect TfL to have strong views on the deliverability of the scheme in light of what that would entail by way of material improvements to public transport and the road network. In any event, the degree of cooperation with the local community contemplated by the National Planning Policy Framework has not been met.

Framework. Underpinning that document should be an impartial and balanced assessment of the impact of a proposal, of the deliverability and sustainability of a proposal, based on proportionate evidence. Simply to rely on the School Place Planning Strategy – with all the inherent weaknesses mentioned above – as the principal and only evidence that a planning decision is appropriate, is a dereliction of duty. The Sustainability Appraisal Report in its present form, as it relates to SA 24, demonstrates that the Council does not have a handle on all the important issues at stake. We, the local community, do.

3.7 But the crux of the issue is this: the entire vision for Mortlake set out in the 2011 APB (“...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”) will be jeopardised if this is allowed to proceed. There is finite space on the Site. The 2011 APB itself represented a compromise between the Council, the local community and other stakeholders. Seeking to replace a small primary school with a large secondary school on the site will inevitably curtail the ability of the developer to deliver what everyone had agreed should be delivered after that compromise. The result will be that important aspects of the 2011 APB are lost, or are pigeon-holed into spaces not fit for purpose, whilst the local community suffers the negative effects of a large secondary school in an area with limited access and high levels of pollution. Add to that the ‘reprovision’ of the playing fields, proposed very late in the day (i.e. just a month ago). For all the technical arguments against adopting the Local Plan in its present form – and these are with real merit here – losing the ability to deliver a sensible, sustainable plan with local support, is what the community is not willing to see happen.

3.8 The Draft Local Plan purports to safeguard the aims of the 2011 APB, but offers no guidance as to whether or how this can be achieved in light of the proposal for a large secondary school. There can, as a matter of substance, be no consultation on a matter so abstract to the extent it is inconceivable. Contrast this with the 2011 APB consultation which included a series of questionnaires and presentations on the back of four alternative concrete land-use and density proposals, and it is apparent how this purported consultation falls short of legal requirements, including the legitimate expectation of the same this time around – which cannot take place if the Local Plan is adopted in its present

form. The Council is in any event under a duty to co-operate with the local community in formulating a Local Plan, but cannot for the last twelve months be said to have done anything other than disregard, and even frustrate, the well-voiced views of the community.

4. RESIDENTIAL HOUSING

4.1 Representation 3 relates to residential housing capacity. The Local Plan does not address residential housing capacity on the Site. There is an opportunity to give the developer a clear steer on this and, consequently, on what space is available for other commercial and community uses.

4.2 The Draft Local Plan does, however, expressly adopt the 2011 APB, which made a number of conclusions as to housing densities and site layout – for instance, to keep taller buildings to the existing footprint and to ensure buildings at the north-western part of the Site do not exceed two-to-three stories.

4.3 Furthermore, the Council, in its responses to earlier consultation rounds, re-affirmed the latest Authority’s Monitoring Report on Housing, which provided for an estimate of 200 to 300 dwellings in total.

4.4 The Council is invited to expressly re-affirm these limits, subject to downward revision to the extent necessary to accommodate any change the Council requires from a primary school to a secondary school. If there is ultimately a secondary school, any reduction in space must come from residential housing (pro rata across affordable and other housing).

5. PLAYING FIELDS

5.1 Representation 4 relates to the reference in the Draft Local Plan to the ‘reprovision’ of the playing fields. Re-provision is undefined, and unexplained, but (i) appears impossible to achieve on the Site and (ii) if that is the case, is akin to removal of the playing fields. This despite the 2011 APB expressly committing to protect them.

5.2 There are a number of issues with this. Perhaps first and foremost, they are a valued green space where green spaces are of a premium. Ask Barnes Eagles football club who use them for home games. Or Thomson House school whose pupils do not otherwise have access to playing fields. Or any number of local residents who look on to or pass them frequently. They also have historical importance – England’s only World Cup winning football team I understand trained there. And not to mention that they are home to a variety of flora and fauna which interact with local and riverside eco-systems.

5.3 From a procedural perspective, there are also a number of further issues this raises:

(a) there is a pending application for Local Green Space designation, which the Local Plan should be acknowledging and expressly accepting;

- (b) trees on the playing fields are the subject of one or more tree preservation orders;
- (c) key users have not been consulted, including Sport England and Barnes Eagles football club; and
- (d) this is a green field space, which the National Policy Planning Framework seeks to require local authorities to protect in Local Plans.

6. CONCLUSION

6.1 There remains a fantastic opportunity to develop the Site in accordance with the aims of the 2011 APB. My understanding is that that plan, including the indicative site plan from the 2011 APB, would continue to be supported by a significant majority of local stakeholders for whom this is a significant issue. That plan was and should remain the 'Plan A', which will deliver sustainable development for Mortlake and the wider Richmond Borough.

6.22 Residents entirely recognise that the Council faces competing demands requiring an analysis of complex facts and difficult decisions – although they would like to see evidence that the Council has properly undertaken that analysis. They even acknowledge that – in some shape or form – secondary education places will be required in the Borough at some point over the medium to long term. However, that does not mean we should collectively accept what is quite clearly a sub-optimal solution here when one gets into the detail. It is using a sledgehammer to crack a nut. And it most certainly does not mean that sub-optimal solutions should be accepted where due process and the principles of natural justice and legitimate expectation have not been followed.

378	181	Max & Emma Millington	SA 24 Stag Brewery, Lower Richmond Road, Mortlake <i>This is referred to as comment 4B out of a set of twelve representations.</i> Rep 4B – The ‘reprovision’ of the playing fields is not possible in light of existing tree preservation orders	No	No	No	Yes	Yes	Yes	Yes	<p><i>See also Appendix 13 to this document comprising summary letter, extract from marketing of site plan, full set of representations and previous comments.</i></p> <p><u>Rep 4B – The ‘reprovision’ of the playing fields is not possible in light of existing tree preservation orders</u></p> <p><u>Issue:</u> The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) refers to ‘the retention <u>and/or reprovision</u> and upgrading of the playing field’.</p> <p>‘Reprovision’ is undefined. Re-provision would likely entail the removal of trees which, I understand, are the subject of a tree preservation order.</p>	<p><u>Detail:</u> The playing fields represent a significant portion of the site, measuring approximately two hectares. For reference, refer to page 5 of the following site marketing document (copyright acknowledged): https://www.geraldeve.com/wp-content/uploads/2015/08/Stag-Brewery-Mortlake-Brochure.pdf</p> <p>They house two playing fields and have at the north-western, north-eastern and southern boundaries a number of trees. Those trees are, I understand, the subject of a tree preservation order, details of which can be provided on request by Mortlake Brewery Community Group.</p> <p>If re-provision of the playing fields would result in the removal of those trees, that would (absent an applicable exception) be a breach of the preservation order.</p> <p>The Draft Local Plan must not promote a proposal that would constitute a breach of law; nor should it promote a proposal that is impossible to deliver.</p> <p>Accordingly, the reference to ‘and/or re-provision’ must be deleted and the presence of the tree preservation order should be expressly acknowledged.</p>	See the Officer response to Comment ID 45 and Comment ID 195 above.
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379	181	Max & Emma Millington	SA 24 Stag Brewery, Lower Richmond Road, Mortlake <i>This is referred to as comment 4C out of a set of twelve representations.</i> Rep 4C – The ‘reprovision’ of the playing fields on the Site would cause a pending application for a designated Local Green Space, if granted, to be prematurely overridden	No	No	No	Yes	Yes	Yes	Yes	<p>See also Appendix 13 to this document comprising summary letter, extract from marketing of site plan, full set of representations and previous comments.</p> <p>Rep 4C – The ‘reprovision’ of the playing fields on the Site would cause a pending application for a designated Local Green Space, if granted, to be prematurely overridden</p> <p><u>Issue:</u> The box at the start of SA24 (Stag Brewery, Lower Richmond Road, Mortlake) refers to ‘the retention <u>and/or reprovision</u> and upgrading of the playing field’.</p> <p>‘Reprovision’ is undefined. The playing fields are the subject of a pending application for designation as a Local Green Space. If afforded that designation, as I believe it should be, re-provision of the playing fields would not be permitted.</p>	<p><u>Detail:</u> The playing fields represent a significant portion of the site, measuring approximately two hectares. For reference, refer to page 5 of the following site marketing document (copyright acknowledged): https://www.geraldeve.com/wp-content/uploads/2015/08/Stag-Brewery-Mortlake-Brochure.pdf</p> <p>They house two playing fields. Those playing fields are enjoyed by many local residents for sports activities and sports groups (such as Barnes Eagles), as well as affording residents an attractive green space. Other organisations also use the space during the week: for instance, they are used by the local primary school (Thomson House) which does not have a playing field and by the police to train dogs.</p> <p>The playing fields have been a green space, special for many reasons, for as long as any local residents can remember. Indeed, such is the importance of the playing fields to the Site and the local area, that the Council saw fit, after a full statutory consultation process, to protect them for generations to come when adopting the 2011 APB.</p> <p>In order to formalise that protection, an application has been made by letter dated on or about 15 February 2017 to designate the playing fields as a Local Green Space pursuant to the National Planning Policy Framework. There appears to be a prima facie strong case for the playing fields to receive that designation, for the reasons set out in the letter.</p> <p>As per section 1.1.5 of the Draft Local Plan, councils must take into account the National Planning Policy Framework when formulating the Local Plan.</p> <p>If that application is successful, as it is expected to be, it would not be possible to re-provide for the playing fields elsewhere.</p> <p>Accordingly, the reference to ‘and/or re-provision’ must be deleted (or made subject to the pending Local Green Space application) and the playing fields should in any event be expressly be afforded the protection which the 2011 APB sought to afford the playing fields.</p>	See the Officer response to Comment ID 45 and Comment ID 195 above. In addition, see the Officer response to Comment ID 259 in relation to the application for the Local Green Space designation.
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375	81	Brian Timbrell , FiSH Neighbourhood Care	SA 24 Stag Brewery, Lower Richmond Road, Mortlake							<p>1. Community Facilities A study in 2000 established that Mortlake was one of the most deprived wards in the Borough and the lack of facilities available for use by the Community was flagged up.</p> <p>Since that time a number of properties that were available have been sold off which together with the demise of a further two public houses, the Charlie Butler and the Railway have further reduced the options of places where local people can meet and socialise.</p> <p>We believe it is vital to make sure that the stock of venues is increased rather than further reduced as part of any future developments in the Ward and that the Mortlake Community Association also needs a new home.</p> <p>As a Director/Trustee of FiSH a local charity that works in partnership with the Council and other local organisations to deliver support to an ever increasing population over the age of 65 I feel extremely strongly that Mortlake needs a new dedicated and assessable venue to be included in the development of the Mortlake Brewery Site.</p> <p>2. Environment & Public Health Mortlake suffers from high levels of pollution from traffic each day given its proximity to Chiswick Bridge, Hammersmith Bridge and the South Circular Road all of which used heavily used by commuters into London. Residents are also subjected to a growing volume of aircraft using Heathrow Airport with its attendant noise and air pollution risks. These risks are acknowledged to be a concern as the volume of particulates rises which has links to a range of diseases ranging from dementia through to heart disease and respiratory disfunctions.</p> <p>As a consequence I believe that in order to discharge its duty of care in respect of public health the Council should include proactive measures in its Local Plan to reduce pollution and increase green space; especially when considering any proposals for new developments. It is noted that the Village Plan recognised the importance of maintaining the green "lung" space currently afforded by Mortlake Green and the Playing Field adjacent to Williams Lane and the Mortlake Brewery Site.</p> <p>3. Parking Over the last 40 years the density of housing and office space has increased throughout Mortlake and congestion on the streets has risen significantly as has the number of households owning and seeking to park one or more cars.</p>		<p>Comments noted.</p> <p>It is noted that the comments only refer to SA 24; however, the Plan should be read as a whole as it does contain policies on environmental impacts, including noise and air pollution.</p> <p>Overall, it is considered that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. Policies need to be sufficiently flexible, for example to take account of changing market conditions, as well as deliverable, and therefore they should not be too prescriptive. The scale, density and massing of the proposed uses and the potential impacts of the proposal, including on character, transport, and amenity, will be assessed as part of consideration of a planning application. In addition, the developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment, which will address matters such as noise, air pollution, traffic and transport etc. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies as well as the National Planning Policy Framework and national guidance. In addition, the Council will liaise closely with public transport providers, including Transport for London, to ensure any scheme coming forward on the site complies with the Council's sustainable transport and parking policies as set out within this Plan.</p> <p>In relation to the comments regarding the need for a secondary school and the consideration of alternative sites, please see the Officer response to Comment ID 45 and Comment ID 195 above.</p>
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I am therefore concerned to hear that the Council maybe considering relaxing the ratio of parking spaces that it applies when considering applications for building on new or brown-field sites.

4. Schools

During recent consultations on the Village Plan the need for more schools to cater for pre-school and primary education was recognised. Not least because two schools in the Ward, Mortlake Church of England School at Mullins Path and Mortlake Green opposite the Mortlake Brewery Site were closed in the 1970's. As a result it was welcome news that a new Primary School was being considered for inclusion within the plans for the redevelopment of the Brewery Site.

However it is now understood that a Secondary School is being proposed. In our opinion this would place a far more challenging set of pressures on the already overburdened local transport system; do nothing for young families who could walk to a primary school and create congestion for existing and any new residents who come to live on the Brewery Site. Indeed I suggest that future pupils as well as the borough in general would be better served if an alternative site were developed.

Such a site that suggests itself is Barn Elms which is far larger with immediate access to a range of established sporting facilities and public transport. The later includes Barnes Station with trains running towards London and with separate loops towards Richmond / Kingston and Hounslow and bus routes linking the south west of London, including Richmond and Tooting with Hammersmith and beyond. By comparison to "shoe-horn" a Secondary into the Brewery Site would seem a very blinkered and limited outcome.

5. Transportation

Since the 1970s the area has become less well serviced by public transport and congestion from more commuters passing through the area in cars.

- The number of stopping services at Mortlake Station has been reduced while conversely the Sheen Lane Level Crossing is now closed for longer periods as more through services are catered for.
- The old Number 9 bus route with double decker buses running from Mortlake right through to the City has been replaced by a 209 service from Hammersmith that

									<p>requires passengers to change at least one. While the reliability of the service has reduced since the Avondale Garage was sold off (which of course has also resulted in more housing and parking congestion).</p> <ul style="list-style-type: none"> • The South Circular road and especially Chalkers' Corner feature on the national list of black spots for rush hour travel congestion. Not only does this cause problems for local residents who wish to travel but it is recognised that the level of pollution that results is detrimental to public health. This problems extends back to the Upper Richmond Road on a daily basis , especially during term time and bus services running towards Richmond and Richmond Manor Circus are frequently stopped short in East Sheen. 		
391	263	Matthew Smith & Stephanie Pemberton	SA 24 Stag Brewery, Lower Richmond Road, Mortlake						<p>We are residents of Williams Lane and live adjacent to the Stag Brewery site. We acquired the property on construction in March 2012, after publication of the 2011 APB referenced below and the public consultation which that followed. We made the purchase in reliance upon those plans, albeit recognising that the final details of any planning consent would need to be ironed out at the relevant time.</p> <p>The location of the Williams Lane and Trinity Mews residences is set out in the Indicative Plan (referred to below) as 'Approved residential development'; the development on Williams Lane and Wadham Mews was completed in 2012 and is referred to in this summary and our representations as the Trinity Mews Development. It can be seen to the north-west of the Site in the picture shown at page 5 here.</p> <p>We have had the benefit of discussing recently the matters raised in this summary with 10 other homeowners on the Trinity Mews Development. We believe the position stated accurately reflects the standpoint of those residents, subject of course to any contrary opinions they may themselves put forward as part of this process, either directly or through the Mortlake Brewery Community Group or any other organisation. Furthermore, the key points made in the representations have also been communicated to the management committee for proprietors and tenants of the c. 63 flats on the Trinity Mews Development. We have received support for the positions stated herein; no-one has opposed it.</p> <p>The presence of the Trinity Mews Development and the views of the Trinity Mews Development residents should properly be taken into account when formulating any revisions to the Site use. The proposed development, if insensitively pursued as appears inevitable from the Draft Local Plan, could blight the lives of the residents both during the construction phase and for years to come.</p>	<p>2.7 The residents of the Trinity Mews Development would like to be in a position to examine these issues against concrete land-use proposals from the developer and/or the Council. The Council has asserted a requirement for a large secondary school, without giving any evidence to the community or (publically) the developer as to how this might be accommodated. The developer's own plans are expected to be made known to the community – despite repeated requests for earlier engagement since the land was acquired – only next month, in March 2017, <u>after</u> the closure of the Local Plan consultation. This is not acceptable. Nonetheless, We can but make these representations on the basis of the facts and generic statements as presently known to us.</p> <p>2.8 Once proper information is provided by the relevant authorities and the developer, we intend to seek expert legal counsel's advice in relation to the processes as conducted to date and, should we be so advised, to pursue one or more claims for judicial review of the Council's decision-making processes and the resultant decisions. We would also strongly recommend the Council either drops the offending provisions of the Local Plan, or at least progresses the Local Plan in the alternative (i.e. with a primary school, retained playing fields and substantially low density housing), until such legal issues are resolved to avoid additional delay to the scheme and cost to taxpayers. We fervently wish to see a sensible plan progress.</p> <p>2.9 Pending this, we expressly reserve all rights and invite the Inspector to take the lead on recognising that what is currently proposed falls a long way short of the procedural steps necessary to incorporate the proposal within the Draft Local Plan but, more importantly, is simply unworkable in its present form.</p> <p>3. REQUIREMENT FOR A SECONDARY SCHOOL ON THE SITE</p> <p>3.1 Representation 2 relates to the 'clear need' (according to the Draft Local Plan) for a large secondary school on the Site. This has certainly not been made out, neither at the time the</p>	See the Officer response to Comment ID 45 and Comment ID 195 above.

In this summary and the representations, we have used the following terms:

(a) “**Draft Local Plan**” means the ‘Council’s Local Plan’ on which consultation responses are presently sought, found in redline against the previous version at http://www.richmond.gov.uk/combined_local_plan_publication_tracked_changes_of_ter_cabinet.pdf; and

(b) “**Site**” means the Stag Brewery site the subject of Site Allocation 24 in the Draft Local Plan’

(c) “**2011 APB**”, the document entitled ‘Supplementary Planning Document Stag Brewery, Mortlake, SW14 Planning Brief Adopted July 2011’ – found at http://www.richmond.gov.uk/stag_brewery_2010-2.pdf. Finally, we refer to the pre-consultation scoping exercise in relation to the village plans carried out in January 2016, my responses thereto (**my Pre-Consultation Responses**) – accompanying this summary for reference – and your short-form responses on those (**RBC Pre-Consultation Response Comments**).

SUMMARY OF POSITION

2.1 In the Pre-Consultation Responses, it was reiterated that residents had (literally) bought into the opportunity to create a new village heart for Mortlake. One that would cater for existing and new communities alike, across a range of facilities and uses designed to promote Mortlake to the fullest extent possible. That vision was set out clearly in the 2011 APB.

2.2 It was also highlighted a number of issues with the Council’s proposal in late 2015, without public consultation, to establish a six-form entry secondary school, plus sixth form, on the Site instead of the much-needed primary school contemplated by the 2011 APB. It was alluded to a number of substantive and procedural issues with these proposals and recommended that further plans incorporate a primary school (as approved in the 2011 APB), at least in the alternative to avoid the Council progressing (at taxpayers’ expense) on the basis of an unworkable, and non-compliant, draft local plan.

2.3 These issues were not properly addressed in the RBC Pre-Consultation Response Comments, nor in the subsequent pre-consultation draft local plan which continued to provide – in abstract terms only – for a large secondary school in place of a primary school. This simply does not work, and there are alternatives.

2.4 The final Draft Local Plan made available in January of this year also now contemplates (for the first time) the ‘reprovision’ of the playing fields that form an intrinsic part of the Site. Those playing fields were expressly protected by the 2011 APB and are of special local and historical importance. There is no commentary in the Draft Local Plan explaining this, however we understand it may

Cabinet adopted the updated School Place Planning Strategy in 2015, nor subsequently.

3.2 The School Place Planning Strategy offers scant insight into how the Cabinet concluded the Site would need to house a large secondary school, plus sixth form. (In fact, it doesn’t refer to a sixth form at all – the Draft Local Plan appears to have made that up).

3.3 It sets out, based on recent historical demographic information, how there will likely be a need for new places over the course of the medium-to-long term in the eastern part of the Borough.

3.4 It then jumps, without analysis, to a conclusion that the Site is the only place a new large secondary school can be accommodated. In so doing, it:

(a) disregards the possibility of two or three smaller schools, on different sites, meeting the perceived shortfall in places – it is obvious that the number of sites big enough to accommodate a school for up to 1,500 pupils and staff will be limited, yet the Education Funding Agency’s remit appears to have covered only larger site capacity;

(b) disregards other sites, with *prima facie* better attributes, which are or may become available – why?;

(c) acknowledges the need to consider (i) availability of places outside the Borough and (ii) expansion of existing schools – but then fails to do that: the Local Plan cannot be adopted whilst this further pre-conditional analysis is acknowledged to be outstanding;

(d) disregards the equally pressing need for a primary school in the local area which the 2011 APD provided for; (e) creates an artificial distinction between the eastern and western parts of the Borough and preventing children travelling an artificial, and in national terms rather short, 6 miles to school – the Education Act 1996, from which the requirement to provide education is derived – makes no such distinction and there are clear, practical reasons to avoid making such a distinction;

(f) crucially, offers no analysis as to the consequences of the decision, principally how it could be delivered alongside the competing requirements of the 2011 APB more generally, but in particular in relation to traffic circulation and access – the Sustainability Appraisal Report is testimony to this; and (g) seems to disregard the fact that emissions of noxious gases adjacent to the Site already exceed legal or recommended safe levels, and that will be exacerbated in any event by the new development: does the Council really want our children, and its staff, to spend the majority of their waking hours in a known pollution hotspot? To do so would be gross negligence, at a minimum.

3.5 In our representations, we identify a number of other legal issues with that decision. But it is worth noting that, according to the minutes of that Cabinet meeting, it lasted

be to accommodate the secondary school referred to above. The playing fields must continue to be protected.

2.5 For the reasons that follow, and set out in much further detail in our full representations, we are firmly of the view that the Council has erred, in process and substance, in reaching the conclusions it appears to have reached in formulating SA 24 of the Local Plan for Mortlake. It is not legally compliant and it is unsound.

2.6 We also have material reservations as to whether or not the Council has complied properly with the duty to co-operate. A number of organisations have clear views on the proposal to remove the playing fields, for instance. We would also expect TFL to have strong views on the deliverability of the scheme in light of what that would entail by way of material improvements to public transport and the road network. In any event, the degree of cooperation with the local community contemplated by the National Planning Policy Framework has not been met.

just 17 minutes. Just 17 minutes to reach a conclusion of significant local importance and which in essence reverses a key component of the (heavily consulted upon) 2011 APB. And that was 17 minutes in total to resolve not just on this issue, but also some twelve other issues on the agenda that night. If that was truly the case, no wonder such an unworkable proposal was the outcome.

3.6 Notwithstanding the purported adoption by the Cabinet of that policy, it is in any event not appropriate for the Council planning department to 'rubber-stamp' the Cabinet decision which was based on primarily on matters of education policy. The Draft Local Plan is a planning document contemplated by statute, the production of which needs to meet a number of procedural and substantive criteria, including under the National Planning Policy Framework. Underpinning that document should be an impartial and balanced assessment of the impact of a proposal, of the deliverability and sustainability of a proposal, based on proportionate evidence. Simply to rely on the School Place Planning Strategy – with all the inherent weaknesses mentioned above - as the principal and only evidence that a planning decision is appropriate, is a dereliction of duty. The Sustainability Appraisal Report in its present form, as it relates to SA 24, demonstrates that the Council does not have a handle on all the important issues at stake. We, the local community, do.

3.7 But the crux of the issue is this: the entire vision for Mortlake set out in the 2011 APB ("*...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*") will be jeopardised if this is allowed to proceed. There is finite space on the Site. The 2011 APB itself represented a compromise between the Council, the local community and other stakeholders. Seeking to replace a small primary school with a large secondary school on the site will inevitably curtail the ability of the developer to deliver what everyone had agreed should be delivered after that compromise. The result will be that important aspects of the 2011 APB are lost, or are pigeon-holed into spaces not fit for purpose, whilst the local community suffers the negative effects of a large secondary school in an area with limited access and high levels of pollution. Add to that the 'reprovision' of the playing fields, proposed very late in the day (i.e. just a month ago). For all the technical arguments against adopting the Local Plan in its present form – and

these are with real merit here – losing the ability to deliver a sensible, sustainable plan with local support, is what the community is not willing to see happen.

3.8 The Draft Local Plan purports to safeguard the aims of the 2011 APB, but offers no guidance as to whether or how this can be achieved in light of the proposal for a large secondary school. There can, as a matter of substance, be no consultation on a matter so abstract to the extent it is inconceivable. Contrast this with the 2011 APB consultation which included a series of questionnaires and presentations on the back of four alternative concrete land-use and density proposals, and it is apparent how this purported consultation falls short of legal requirements, including the legitimate expectation of the same this time around – which cannot take place if the Local Plan is adopted in its present form. The Council is in any event under a duty to co-operate with the local community in formulating a Local Plan, but cannot for the last twelve months be said to have done anything other than disregard, and even frustrate, the well-voiced views of the community.

4. RESIDENTIAL HOUSING

4.1 Representation 3 relates to residential housing capacity. The Local Plan does not address residential housing capacity on the Site. There is an opportunity to give the developer a clear steer on this and, consequently, on what space is available for other commercial and community uses.

4.2 The Draft Local Plan does, however, expressly adopt the 2011 APB, which made a number of conclusions as to housing densities and site layout – for instance, to keep taller buildings to the existing footprint and to ensure buildings at the north-western part of the Site do not exceed two-to-three stories. 1 “...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”

4.3 Furthermore, the Council, in its responses to earlier consultation rounds, re-affirmed the latest Authority’s Monitoring Report on Housing, which provided for an estimate of 200 to 300 dwellings in total.

4.4 The Council is invited to expressly re-affirm these limits, subject to downward revision to the extent necessary to accommodate any change the Council requires from a primary school to a secondary school. If there is ultimately a secondary school, any reduction in space must come from residential housing (pro rata across affordable and other

housing).

5. PLAYING FIELDS

5.1 Representation 4 relates to the reference in the Draft Local Plan to the 'reprovision' of the playing fields. Re-provision is undefined, and unexplained, but (i) appears impossible to achieve on the Site and (ii) if that is the case, is akin to removal of the playing fields. This despite the 2011 APB expressly committing to protect them.

5.2 There are a number of issues with this. Perhaps first and foremost, they are a valued green space where green spaces are of a premium. Ask Barnes Eagles football club who use them for home games. Or Thomson House school whose pupils do not otherwise have access to playing fields. Or any number of local residents who look on to or pass them frequently. They also have historical importance – England's only World Cup winning football team we understand trained there in training for the 1966 World Cup. And not to mention that they are home to a variety of flora and fauna which interact with local and riverside eco-systems.

5.3 From a procedural perspective, there are also a number of further issues this raises: (a) there is a pending application for Local Green Space designation, which the Local Plan should be acknowledging and expressly accepting; (b) trees on the playing fields are the subject of one or more tree preservation orders; (c) key users have not been consulted, including Sport England and Barnes Eagles football club; and (d) this is a green field space, which the National Policy Planning Framework seeks to require local authorities to protect in Local Plans. (e) the LBRUT Village Plan for the Mortlake area

(http://www.richmond.gov.uk/home/my_richmond/village_plans/mortlake_area_village_plan_xx/planning_and_development_mortlake.htm) designated the playing fields at Williams Lane as **protected open land**.

6. CONCLUSION

6.1 There remains a fantastic opportunity to develop the Site in accordance with the aims of the 2011 APB. Our understanding is that that plan, including the indicative site plan from the 2011 APB, would continue to be supported by a significant majority of local stakeholders for whom this is a significant issue. That plan was and should remain the 'Plan A', which will deliver sustainable development for Mortlake and the wider Richmond Borough.

6.2 Residents entirely recognise that the Council faces competing demands requiring an analysis of complex facts and difficult decisions – although they would like to see evidence that the Council has properly undertaken that analysis. They even acknowledge that – in some shape or form – secondary education places will be required in the Borough at some point over the medium to long term.

265	284	Catherine Mason, Savills on behalf of Thames Water Property	SA 26 Kew Biothane Plant, Mellis Avenue, Kew	No	Yes	Yes	<p>On behalf of Thames Water Property, please find enclosed representations submitted in relation to the Publication Version of the Local Plan. I have set out our comments below which relate to Policy SA 26 (Site Allocations). We are disappointed that our comments made in respect of the pre-publication version of the plan have not been taken into account. Our objection therefore remains. Paragraph 182 of the National Planning Policy Framework (NPPF) identifies the tests of soundness for the examination of Local Plans. To be considered sound, plans should be:</p> <ul style="list-style-type: none"> - Positively prepared - Justified - Effective - Consistent with national policy <p>We generally support site allocation SA26 (formerly SA25) but object to the penultimate bullet point, which states:</p> <p><i>"Parts of the site are designated as Metropolitan Open Land and development in this area would not be acceptable. There is an expectation that any redevelopment proposal improves the character and openness of the Metropolitan Open Land."</i></p> <p>This is not considered to conform with national guidance in the NPPF.</p>	<p>The London Plan sets out that Metropolitan Open Land is given the same status, in planning terms, as Green Belt. The NPPF states, at paragraph 89, that certain types of development are not 'inappropriate' within the Green Belt. This includes:</p> <p><i>"limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development."</i></p> <p>This is the proper policy test that should determine whether development on site SA26 is acceptable or otherwise. The NPPF does not state that development on Green Belt (or Metropolitan Open Land) is unequivocally unacceptable. There are parts of the Kew Biothane site that constitute Previously Developed Land within Metropolitan Open Land. Accordingly, SA26 as proposed is not consistent with national planning policy. The relevant section of NPPF paragraph 89 should apply. Further, the NPPF allows 'very special circumstances' to justify inappropriate development within the Green Belt. We therefore request that the penultimate bullet point in allocation SA26 is deleted and replaced with:</p> <p><i>"Parts of the site are designated as Metropolitan Open Land. Development within Metropolitan Open Land should be consistent with the NPPF such that redevelopment should not have a greater impact on the openness of the Metropolitan Open Land, unless very special circumstances apply."</i></p> <p>The Local Plan as drafted is unsound for the reasons highlighted above and Policy SA26 is therefore not justified or consistent with national policies in the NPPF. We request the right to participate should the plan go forward to Examination, this will enable us to fully appraise the Inspector of our concerns. In the meantime, please do not hesitate to contact me should you have any queries or would like to discuss.</p>	<p>Comments noted. It is considered that policy SA 26 as included within the Local Plan is consistent and in general conformity with the NPPF. Any development proposal coming forward on this site will be assessed against the site allocation policy as well as the other policies set out within the Plan, including LP 13 in relation to MOL, relevant London Plan policy as well as NPPF policy on Green Belt.</p> <p>It is however not considered appropriate to refer to and include cross-references within various policies of the Plan to the NPPF. No changes required.</p>
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191	288	Sarah Hoad, Transport for London	SA 27 Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen							<p>This letter follows receipt of the notification that the London Borough of Richmond has undertaken consultation on the publication version of the proposed Local Plan. The following provides relevant updates and commentary on the proposed wording where appropriate, which follows previous consultation in January 2016 and July 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.</i></p> <p>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. The GLA letter makes reference to the need to have regard to TfL's specific comments in respect of transport and infrastructure.</p> <p>SA27, Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen Details of the level of development being considered at this site should be provided to TfL given the proximity and impact to the A205 Sheen junction, where a significant junction and street improvement project is being developed.</p>		<p>Comments noted. No changes required. The Council will work with TfL as and when a proposal for development comes forward for this site.</p>
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138	224	Howard Potter	SA 28 Barnes Hospital		<p>I strong disagree with a primary provision on this site. It is inappropriate as access is extremely limited due to the width of South Worple Way and parking on the south verge. It is also very close to other existing provisions at Barnes Primary, St.Mary Magdalen’s and Thomson House.</p>	<p>The Stag [SA 24] site offers a better primary school location than that proposed in SA. 27 – Barnes Hospital , which would suffer from very poor, restricted width, vehicular access on South Worple Way, and would be very close indeed to three other existing primary schools.(Barnes Primary, St Mary Magdalen’s and Thomson House).</p>	<p>Comments noted. No changes required. National planning policy and guidance sets out 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. Richmond Council has a statutory duty, under Section 14 of the Education Act 1996, to ensure a sufficiency and diversity of state-funded school places within its administrative area for children of compulsory school age. This policy is based upon the Council's School Place Planning Strategy, which is regularly reviewed and updated and therefor considered to be a strong and robust evidence. The current School Place Planning Strategy, as revised in October 2015, states a need for a 2-form of entry primary on the Barnes Hospital site. It is understood that the need for more primary places has decreased since then and the need for new Special Education Needs (SEN) school places in the borough has considerably increased. Consequently, the School Place Planning Strategy is being revised at the moment to prioritise the need for a special free school on the site, which would take up a similar amount of space as a 2-form of entry primary school but have less of an impact upon local infrastructure. It should be noted that the Council is working closely with the Health Trust and the Education Funding Agency to ensure the delivery of a school on this site. It is not appropriate to consider the provision of a primary school at the Stag Brewery site (SA 24) as this has been identified as a priority for the provision of a secondary school, and the Council is working with the developer and the Education Funding Agency to deliver the secondary school on the Stag Brewery site.</p>
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236	66	Peter Eaton	SA 28 Barnes Hospital, East Sheen		No	No	Yes		<p>I strong disagree with a primary provision on this site. It is inappropriate as access is extremely limited due to the width of South Worple Way and parking on the south verge. It is also very close to other exiting provisions at Barnes Primary, St. Mary Magdalen's and Thomson House.</p>	<p>Comments noted. No changes required. National planning policy and guidance sets out 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. Richmond Council has a statutory duty, under Section 14 of the Education Act 1996, to ensure a sufficiency and diversity of state-funded school places within its administrative area for children of compulsory school age.</p> <p>This policy is based upon the Council's School Place Planning Strategy, which is regularly reviewed and updated and therefor considered to be a strong and robust evidence. The current School Place Planning Strategy, as revised in October 2015, states a need for a 2-form of entry primary on the Barnes Hospital site. It is understood that the need for more primary places has decreased since then and the need for new Special Education Needs (SEN) school places in the borough has considerably increased. Consequently, the School Place Planning Strategy is being revised at the moment to prioritise the need for a special free school on the site, which would take up a similar amount of space as a 2-form of entry primary school but have less of an impact upon local infrastructure. It should be noted that the Council is working closely with the Health Trust and the Education Funding Agency to ensure the delivery of a school on this site.</p>
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239	22	Francine Bates & Russell Campbe II	SA 28 Barnes Hospital, East Sheen							<p>We disagree with a primary provision on this site. It is inappropriate as access is extremely limited due to the width of South Worple Way and parking on the south verge. It is also very close to other existing provisions at Barnes Primary, St. Mary Magdalen's and Thomson House.</p>		<p>Comments noted. No changes required. National planning policy and guidance sets out 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. Richmond Council has a statutory duty, under Section 14 of the Education Act 1996, to ensure a sufficiency and diversity of state-funded school places within its administrative area for children of compulsory school age. This policy is based upon the Council's School Place Planning Strategy, which is regularly reviewed and updated and therefor considered to be a strong and robust evidence. The current School Place Planning Strategy, as revised in October 2015, states a need for a 2-form of entry primary on the Barnes Hospital site. It is understood that the need for more primary places has decreased since then and the need for new Special Education Needs (SEN) school places in the borough has considerably increased. Consequently, the School Place Planning Strategy is being revised at the moment to prioritise the need for a special free school on the site, which would take up a similar amount of space as a 2-form of entry primary school but have less of an impact upon local infrastructure. It should be noted that the Council is working closely with the Health Trust and the Education Funding Agency to ensure the delivery of a school on this site.</p>
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317	189	Shaun Lamplough, Mortlake with East Sheen Society	SA28 Barnes Hospital Page 191							<p>MESS comments on Pre-Publication Local Plan, August 2016 - Concerns about developing part of this site alongside the remnant hospital for a primary school. Our preference for this site alongside the remnant hospital is for a housing development, including social housing, for which a scheme already exists</p> <p>Council's response to MESS comments, January 2017 - The Council's School Place Planning Strategy 2015-2024 sets out the need for a primary school in this area. The site is an existing community / social infrastructure use, and therefore such uses should be fully explored and options discounted in line with other policies in the Plan before considering other uses, such as residential.</p> <p>MESS comments on Publication Local Plan, February 2017 - The Council's School Place Planning Strategy 2015-2024 states: "Expansion of Barnes Primary must be considered if a third site, ideally 0.5ha of the (1.3ha) Barnes Hospital site can be secured. Longer-term, if Stag Brewery is redeveloped the planning brief for the site includes space for a 2FE primary school." The MESS view is that the 2FE primary school should go ahead on the Stag Brewery site and the secondary school relocated elsewhere.</p>	<p>Comments noted. No changes required. National planning policy and guidance sets out 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. Richmond Council has a statutory duty, under Section 14 of the Education Act 1996, to ensure a sufficiency and diversity of state-funded school places within its administrative area for children of compulsory school age.</p> <p>This policy is based upon the Council's School Place Planning Strategy, which is regularly reviewed and updated and therefore considered to be a strong and robust evidence. The current School Place Planning Strategy, as revised in October 2015, states a need for a 2-form of entry primary on the Barnes Hospital site. It is understood that the need for more primary places has decreased since then and the need for new Special Education Needs (SEN) school places in the borough has considerably increased. Consequently, the School Place Planning Strategy is being revised at the moment to prioritise the need for a special free school on the site, which would take up a similar amount of space as a 2-form of entry primary school but have less of an impact upon local infrastructure.</p> <p>It is not appropriate to consider the provision of a primary school at the Stag site (SA 24) as this has been identified as a priority for the provision of a secondary school.</p>
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266	284	Catherine Mason, Savills on behalf of Thames Water Property	Chapter: 12 Site Allocation Paragraph: 12.1.1	No		Yes	Yes	<p>London Borough of Richmond Upon Thames Local Plan Publication Version Hampton Water Treatment Works, Lower Sunbury Road, Middlesex, TW12 2ES</p> <p>On behalf of Thames Water Property, please find enclosed representations submitted in relation to the Publication Version of the Local Plan.</p> <p>I have set out our comments below which relate to Chapter 12 of the document (Site Allocations). We are disappointed that our comments made in respect of the pre-publication version of the plan have not been taken into account. Our objection therefore remains.</p> <p>Paragraph 182 of the National Planning Policy Framework (NPPF) identifies the tests of soundness for the examination of Local Plans. To be considered sound, plans should be:</p> <ul style="list-style-type: none"> - Positively prepared - Justified - Effective - Consistent with national policy <p>We are concerned that the emerging Local Plan does not make any allocations in respect of the Hampton Water Treatment Works. It is proposed by the London Borough of Richmond Upon Thames that Saved UDP Allocation H1 will be superseded by the new proposed allocations and that this designation will fall away. This will create uncertainty for any future redevelopment discussions for the site.</p> <p>London Borough of Richmond Upon Thames' (LBRUT) Saved UDP Policies allocate land and buildings at Hampton Water Treatment Works (H1) for:</p> <p><i>Conversion of redundant Thames Water buildings for business, residential and other compatible uses together with re-use of the associated filter beds and surrounding land.</i></p> <p>This is shown on the extract from the Core Strategy Proposals Map below:</p> <p>See Appendix (25) of this document</p> <p>Chapter 12 of the UDP sets out the details of allocation H1 and states:</p> <p><i>'Thames Water has indicated that the eastern part of the treatment works will become surplus to requirements.</i></p>	<p>The site should be the subject of two allocations:</p> <ol style="list-style-type: none"> 1) Karslake and Ruston Ward Buildings (see location plan) – these buildings currently fall within the adopted H1 designation. A request for pre-application advice in respect of these buildings was submitted to the Council on 5 August 2016 for proposed conversion of the buildings to provide 10 residential units. This part of the site should therefore be allocated for residential conversion. The south portion of Ruston Ward will remain as storage, workshops and offices for use by the Thames Water and therefore does not form part of the proposed residential allocation. This already has its own access from Lower Sunbury Road and there will be no access from the residential development to this to ensure security of this part of the building. 2) The remainder of the current H1 allocation should be carried over into the emerging Local Plan (see location plan titled Hampton Water Treatment Works Proposed H1 as amended). <p>Paragraph 12.1.1 of the emerging Local Plan states that the Council has identified key sites that are considered to assist with the delivery of the Spatial Strategy of this plan. Hampton Water Treatment Works is considered to be a key site within the Borough and as such its future development potential should be defined within this plan.</p> <p>I have summarised below the reasons why the two sites should be allocated:</p> <ol style="list-style-type: none"> 1) Karslake and Ruston Ward – <p>As set out in the pre-application request the buildings are only partially occupied by Thames Water and only a small section of Karslake in particular is in use, as informal workshops and offices. Both buildings are in a state of disrepair and in need of refurbishment. None of the workshops or offices are occupied on a full time basis as operatives are predominantly involved in the hands-on running of the water treatment works surrounding the filter beds and reservoirs. The Karslake building housed two pumping rooms both of which are now disused, one of which has standing water.</p> <p>The buildings are surplus to Thames Water's requirements and the necessary operations are now undertaken on the wider site. The existing employees who work within the buildings (on an infrequent basis) (approximately 20) will be relocated to what is currently a partially disused building on the main site. There will therefore be no loss of employment</p>	<p>Comments noted. No changes required. The NPPF policy in relation to Green Belt as well as the local policy on MOL/Green Belt allow for exceptions to be made to Green Belt policies. Para 89 of the NPPF sets out the exceptions that can be considered within Green Belt, and other policies within the Local Plan, such as in relation to employment, would also need to be applied. Also note that the local policy allows for essential utility infrastructure within the Green Belt/MOL. Therefore, the Council considers that it is more appropriate to deal with any future redundant Thames Water buildings as part of planning applications, as and when they are declared surplus to requirements.</p> <p>In addition, Karslake and Ruston Ward Buildings will not be allocated for residential use and should be dealt with through the normal planning application process. Employment policies must be addressed first, with marketing evidence to reflect the policy requirement for the buildings to be restored for commercial use (similar to the adjacent buildings) or possibly a mixed use scheme. Appendix 5 of the Local Plan sets out the approach that the Council expects applicants to take in relation to marketing.</p>
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Conversion of listed buildings for mixed use development (business, residential and other compatible uses) is desirable to ensure their retention and provide the opportunity for a mixed use development allowing a working community to develop, and reducing the need to travel. However, the achievement of such objectives may necessitate development going outside and beyond the footprints of the listed buildings. The nature of such development would need to be assessed with reference to the site's green belt designation. Development would be limited to the minimum necessary to achieve viability and this would be demonstrated through detailed financial analysis. Any permission granted would be subject to a legal agreement to ensure that the conversion of the listed buildings is phased in relation to new development. With the foregoing possible exception, the existing water treatment lagoons should be retained to preserve the open area which has an important relationship with the river and forms a setting for the listed buildings. Proposals should have regard to the improvement of links to the riverside, the creation of a public riverside walkway, and the improvement of pedestrian and cycle links to the site. Mature trees along the Lower Sunbury Road and the riverside must be retained.'

We believe that the site should remain allocated for redevelopment and that its removal from this policy designation as proposed in the emerging document does not meet the tests set out in the NPPF.

The removal of this site as an allocation is not justified.

on the site. The new location for the employees is much more practical for the operation of the site as it is more central and allows full surveillance of the key assets on the site at all times. This is essential to maintain high security as cross contamination of water is a serious potential threat at this sensitive site.

In order for the buildings to meet modern standards significant works will be necessary and due to the size, location and level of work it is highly unlikely that an occupier (for employment) will come forward with a requirement for the whole of either building and the funds to undertake the works. Employment rents will simply not be sufficient to generate the investment required in the buildings. Alternative uses for the site have been considered, however, our assessment is that other uses on the site would not generate enough value to allow refurbishment and maintenance of the existing listed buildings on the site.

The residential redevelopment of the site is considered to be the most appropriate use. It is a use for which there is significant demand and we can anticipate the converted and new residential units to be saleable. The long term management of the development (and the listed buildings) can be guaranteed via the formation of a management company (funded by an annual management charge).

The optimal viable use for these buildings is conversion to residential, which will safeguard the future of these Listed Buildings.

For the reasons set out above, residential use is considered to be the most appropriate use for the building and the only viable option to ensure the future of these listed buildings. Safeguarding the listed buildings and bringing them back into permanent use is considered to be a priority. Furthermore conversion to residential accommodation allows minimal intervention of the historic fabric of the buildings (as set out in the pre-application request).

The redevelopment of this site will reuse previously developed land which is one of the key principles set out within the NPPF (paragraph 17) and deliver much needed housing. It constitutes sustainable development whereby paragraph 14 of the NPPF and the presumption in favour of development therefore apply.

The Karlake and Ruston Ward buildings lie outside of the Green Belt. The compatibility of residential development on this part of the site has already been established by the cottages and house attached to Karlake.

2) Whilst the remainder of the H1 allocation remains operational at present, there is the potential that this area could become surplus to requirements over the plan period. The allocation for conversion of redundant Thames Water buildings for business, residential and other compatible uses together with re-use of the associated filter beds and surrounding land therefore remains relevant and should be included within the new Local Plan. This will provide certainty should the site come forward for development. This site has the potential to make a significant contribution to the Council's land supply requirements later in the plan period.

The Hampton Water Treatment Works is an important site within the Borough and it is therefore critical that the plan identifies opportunities and sets the parameters for potential redevelopment for parts of the site which are or may become surplus to Thames Water's requirements.

The Local Plan as drafted is unsound for the reasons highlighted above and is therefore not justified or effective.

We request the right to participate should the plan go forward to Examination, this will enable us to fully appraise the Inspector of our concerns. In the meantime, please do not hesitate to contact me should you have any queries or would like to discuss.

83	68	Paul Edelin	SA24 Stag Brewery, Mortlake							<p>Any proposal for colossal redevelopment on the Mortlake Brewery site will fail miserably as a worthwhile project until the very severe associated problem of the limited capacity of the Mortlake Station – Sheen Lane level crossing is properly addressed and resolved. There are only 60 minutes in one hour. High volumes of road and rail traffic must be able to cross successfully over each other in more places than just at Clifford Avenue. The level crossings in the section between Richmond and Barnes must be redesigned or replaced to cope with more traffic BEFORE anyone plays around on the Brewery site.</p> <p>Incidentally I support the idea of a secondary school located beside the river but I reject any residential development of the brewery site which might reduce the amount of green space.</p> <p>How about replacing most of Mortlake Cemetery with a new school?</p> <p>What does Transport for London have to say about the Brewery site?</p>	<p>Comments noted. Support for secondary school welcomed.</p> <p>It is considered that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. Policies need to be sufficiently flexible, for example to take account of changing market conditions, as well as deliverable, and therefore they should not be too prescriptive. The scale, density and massing of the proposed uses and the potential impacts of the proposal, including on character, transport, and amenity, will be assessed as part of consideration of a planning application. In addition, the developer / applicant will be required to submit a variety of supporting information and detailed assessments that will need to accompany the planning application, including an Environmental Impact Assessment, which will address matters such as traffic and transport etc. The Council will then consider all submitted information against all the relevant Local Plan and London Plan policies as well as the National Planning Policy Framework and national guidance.</p> <p>Mortlake Cemetery is a currently operating cemetery that is protected open land (OOLTI) and it is an inappropriate site for the development of a secondary school.</p> <p>Transport for London have commented on the Stag Brewery site policy SA 24 as part of this consultation. See Comment ID 190 above.</p>
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154	117	John Holmes	SA 24 Stag Brewery, Mortlake												<p>I have three main points of serious concern with the current development plan, as follows:</p> <ol style="list-style-type: none"> 1. The density proposed looks to be excessive with 1,000 housing units, potentially around 2,500 increase in residents) and a 1,000 pupil secondary school, I would suggest that serious consideration be given to an alternative site for the school at Barn Elms, a site owned by the Borough and offering better public transport and access to comprehensive playing fields. 2. There is already a considerable flow of traffic adjacent to the Brewery site from the 205, Mortlake High Street and Sheen Lane, compounded by the frequent closure of the level crossing gates likely to increase when Crossrail opens. It is estimated that the increase in traffic could be as high as 50% in an already heavily congested area with poor public transport. 3. Both during the redevelopment work and on completion levels of pollution will be increased in an area of already unacceptably high pollution levels, the proximity of increased residency with children plus the location of the school is potentially damaging to the next generation's long term health. 		<p>See Officer response to Comment ID 45 above.</p> <p>It should be noted that the Plan should be read as a whole as it does contain policies on environmental impacts, including pollution, as well as transport policies.</p>
156	76	Michael Fasosin	SA 24 Stag Brewery, Mortlake	No	No	No	Yes	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.</p> <p>Except as follows, I endorse the views expressed by Mortlake Brewery Community Group in its representation(s).</p>	<p>Amend as follows, (i) replacing references to the secondary school with a primary school of the type approved in the 2011 adopted supplementary planning brief for the site and (ii) removing the reference to the 'reprovision' of the playing fields. Suggested amended text</p> <p>8.2.11 Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan: Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form of entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school</p> <p>13.1.7 13.1.7 A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population. Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners,</p>	<p>See Officer response to Comment ID 42 above.</p>				

including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses:
Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college
Stag Brewery, Mortlake: provision of a new 2-form of entry primary school
Ryde House, East Twickenham: provision of a new 2-form of entry primary school
Barnes Hospital, Barnes: provision of 2-form of entry primary school

SA 24 Stag Brewery, Lower Richmond Road, Mortlake
The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 2-form entry primary school, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.

A corresponding change should be made to the text on page 107 of the Sustainability Appraisal Report as it relates to SA24.

- The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities.
- The brewery operations on this site have ceased at the end of 2015; the site has been marketed and sold.
- There is a need to create a new village heart and centre for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities.
- There is a clear need for a new primary school in this area. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.
- Remaining text unchanged

upgrading of the playing field. The Council will expect the provision of high quality open spaces.... as well as a new publicly accessible green space link to the riverside." The statement is followed by supporting text in 12 bullets. We have no argument with nine of these bullets but have comments on the 1st, 4th and 10th bullets as follows:

concern is about a disconnect between the policy statement and the development brief with regard to the 4th and 10th bullets below. The Secondary School The development brief clearly states (para 5.20) that "the Council will support the provision of a two form entry Primary School" and that "the preferred location for any school facilities is adjacent to the existing sports fields in the south west area of the site." The 4th bullet (DSA 24), however, re-iterates the need for the secondary school "as set out in the Council's School Place Planning Strategy" and adds that "the Council expects any redevelopment proposal to allow for provision of this school." We can understand the need for a new secondary school somewhere in the eastern part of the Borough (the current population in the state primary schools in this part being some 6,000 while the current 2 population in the three state secondary schools is about 2,700). Our concern, however, is that the provision of a new 6-form entry secondary school, plus sixth form – in order to be comparable with the other secondary schools – will require a site of about 4 ha including the existing sports fields, leaving only 4.6 ha for the housing development and new village centre for Mortlake (the total site area being 8.6 ha). We are also concerned about the location of this secondary school. We have not seen the latest emerging plans and are wondering if the chosen location is alongside the Lower Richmond Road rather than on the site of the primary school shown in the development brief. Schools should not be located alongside heavily congested roads with high pollution levels. Whilst we accept that the appropriate location for a new secondary school should be on the north side of the railway serving Barnes, Mortlake and Kew, which have no secondary school, we are of the opinion that there is an alternative location on this side of the railway worth exploring. We are also of the opinion that the Brewery site is more suitable for a primary school, rather than the site proposed at Barnes Hospital (SA 27) which has such poor access. The Sports Fields The development brief states (para 5.38) that "the existing sports recreation ground on the site is allocated as Other Open Space of Townscape Importance. Future proposals for the site will need to ensure that the development adjacent to the area of open land has regard to the visual impact on the character of the open land. The Council will seek the retention of the two existing football pitches/one cricket pitch for increased public use." We note, however, that the 10th bullet (SA 24) states: "links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provide the opportunity to integrate the development and new communities with the existing Mortlake community." While we support this aim we are concerned that there is no further mention of the retention and/or reprovision of the

playing field. We have not yet seen the emerging plans but we are much concerned that, in order to allow more space for the housing development and village centre, these sports fields may be sacrificed and that reprovision may take the form of a single all-weather football pitch. Such reprovision would not be acceptable. These sports fields are a valuable local asset, they have never been built on and they were used as a training ground by the England football team before they won the World Cup in 1966. The Housing Development We have heard that the developer is proposing to provide some 850 apartments plus 200 sheltered units. We have also heard that the majority of the apartments will be 3- and 4-bedroom family units. We have calculated the density to be in the region of 420 habitable rooms per hectare. This is higher than the density of comparable recent developments on the Barnes and Kew Riversides and is similar to the density of the recently approved redevelopment of the Teddington Studios. It is also within the upper limit of 450 habitable rooms per hectare for development in an urban setting with limited public transport accessibility (as here) as given in the Greater London Authority's Supplementary Guidance on Density (2016). 3 However, part of the site has to be excluded from the calculations, namely the existing sports fields and the land required for the secondary school and village centre, and this could result in a significantly higher density (possibly twice as high). Such an increase in density would result in a significantly higher and more massive housing development which would reduce the quality of life for its residents and for the existing community. It should be noted that according to the 2011 Census there are 4,771 households occupying 185 ha in the Mortlake/Barnes Common ward. The proposed 1,050 households (including 200 sheltered) should by the same token be occupying about 40 ha but will in practice be occupying nearly one tenth of that. The increase in density will also have an adverse impact on traffic in Lower Richmond Road which is already congested in the peak hour due to constraints at the Chalkers Corner junction at one end and the Sheen Lane junction and level crossing at the other. Overall Development We are concerned that the emerging plans will show a serious overdevelopment of the site. We accept there is a need for more housing – in particular affordable housing – and for a secondary school but we are of the opinion that the two cannot be provided together on the same site. We have identified an alternative site for the school and have already made a separate submission to the Council in this regard

26	199	Una O'Brien	SA 24 Stag Brewery, Mortlake Comments relate to SA24 - Mortlake Stag Brewery, page numbers 186-187 in the Publication Local Plan	No	No		Yes	Yes	Yes	<p>Regarding SA24, the text begins with a commitment to the 2011 Planning Brief for the Stag Brewery. brief was the result of extensive consultation with the local community. However what follows in the text is not compliant with the 2011 Planning Brief.</p> <p>1. Whereas the 2011 Brief stated that the Council would support a 2 form entry primary school, the Local Plan now says this is replaced by a 6 form entry and 6th form secondary school.</p> <p>This change was made without any consultation with the local community. The community were given no notice that the change would be discussed at a Cabinet Meeting in the autumn of 2015. Insufficient evidence has been put before the Council members to justify this change on three fronts.</p> <p>Firstly the option of expanding existing schools has not been sufficiently examined or discussed with local schools. It is well known that Richmond Park Academy would be willing to expand and have the space, for example. Secondly insufficient evidence has been put before the community of the Council's joint working with neighbouring boroughs Hounslow and Wandsworth regarding secondary school provision</p> <p>Thirdly, if after these avenues have been fully and clearly examined there remains a case for an additional secondary school, there is not available a full option appraisal of sites., including costs, to the taxpayer. The additional land required on the Stag Brewery site will potentially have to be bought from the developer by the EFA. Whereas there is other land, such as on the Barn Elms site, which the Council already owns.</p> <p>Fourthly there is no reference to primary school provision: currently parents are finding it very difficult to have their 4 year olds placed on local schools - there is no reference in SA24 to the primary school requirements of the Stag Brewery new residents or how they will be met.</p> <p>2. The sports field within the Stag Brewery site. The 2011 Planning Brief is very clear: it states that the Council will seek the retention of the two existing football pitches, and that it will seek the retention and upgrading of the playing field, making it more accessible for public use. However text at SA24 is not clear on the future of the playing field. In order for the Local Plan to be compliant it should explicitly re-state the wording of the 2011 Planning Brief regarding the protection of the playing field.</p> <p>3. Traffic - the text in SA24 does not sufficiently acknowledge the likely impact on traffic in the area arising from this development and specifically does not give adequate guidance to developers of the thresholds on traffic movement, and pollution that will be acceptable for planning purposes.</p>	<p>In order to be legally compliant it would be necessary to provide a more full justified and evidenced explanation for the confusion within SA24 where the Council simultaneously re-commits to the 2011 Planning Brief for the Stag Brewery site and changes it without consultation with the local community. Even to proceed without such consultation requires full evidence and analysis as to the reasons for the changes and the knock-on consequences for other aspects of the development.</p>	<p>See Officer response to Comment ID 45 above.</p>
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35	208	Nicholas Grundy, Park Road Surgery Teddington	Para 12.1.4 and sub-paragraphs Policies: LP13, LP14, Equalities Impact Assessment, Health Impact Assessment	Yes	No	No	Yes	Yes	Yes	<p>Why the Local Plan is not 'sound'</p> <p>(1) It was not positively prepared, as it did not adequately engage with local healthcare providers despite the plan acknowledging the need for improved primary care provision in the borough.</p> <p>(2) It is not justified because the omission of the council site on North Lane / Middle Lane from the site allocations does not allow best use of land in the borough in keeping with the other aims of the plan</p> <p>-LP1 states that “the public realm should be designed to be safe and accessible for all ages and levels of disabilities”. This is not the case for the existing NHS primary care estate in Teddington, based on survey data and the outcomes of practice Care Quality Commission reports.</p> <p>-LP27 “seeks to maintain local shops and services within walking distance of where people live”. Park Road Surgery will cap their list at 13,500 patients, at which point there is a risk of there being either no choice of GP surgery within walking distance of local residents (if Thameside Medical Practice remains open, where they would continue to be the only option), or no GP surgery at all (if Thameside Medical Practice merges or closes, where there would be no surgery in Teddington at which new patients could register).</p> <p>-LP29, which “seeks to secure local job and training opportunities”; CP 16 Local business; and DM EM 2 Retention of Employment; although the practice train junior doctors and medical students, currently 2 of the 3 GP trainers are unable to train each year. Similarly, although the practice has occasional nursing and family planning trainees on-site, these opportunities are limited in the current building. Finally, the practice takes apprentices on from Kingston Adult Education college, and again these options are limited by, and at risk in, their existing building. The proposed change would protect town centre land for local employment, allaying the loss of employment to Permitted Development Rights.</p> <p>-These proposed enhanced employment opportunities are in keeping with national healthcare guidance - NHS England, £10 million investment boost to expand general practice workforce (http://www.england.nhs.uk/2015/01/26/boost-gp-workforce/), Health Education England, District Nursing and General Practice Nursing Service – education and career framework (http://www.hee.nhs.uk/sites/default/files/documents/District%20nursing%20and%20GP%20practice%20nursing%20framework_0.pdf); the Queen's Nursing Institute The Queen's Nursing Institute, General Practice Nursing in the 21st Century: a time of opportunity. 2015</p>	<p>How this would make the plan sound</p> <p>The site is large enough to make up almost all the shortfall of primary care space in Teddington as stated by Richmond CCG in their submission to the council under the Duty to co-operate consultation, and the practice have taken plans for a proposed new surgery on it to a concept meeting with council planners. It provides a site for a readily-deliverable, modern GP surgery supporting both local health needs as outlined above, the local direction of travel in the form of the Sustainability & Transformation Plan referenced in the Local Plan, and the national direction of travel of the NHS. We would emphasise the failure of the site in its existing form to meet the aims of CP7 Maintaining and Improving the Local Environment. The hoarding around the front of the carpark, and the 8-foot weeds growing within the hoarded area, are ugly and break the character of the surrounding streets. This is reflected in our patients' comments, e.g.: “We live on Number 27 Middle Lane, which is directly opposite the proposed site. The current car park is a bit of an eye-sore, and we like the idea of this site being used for a doctors surgery.”</p> <p>The proposal to include the site in the Site Allocations would contribute to its “maintaining and enhancing the quality of the local built environment” in keeping with CP7.</p> <p>The proposal to include the site in the Site Allocations section of the Local Plan would support DM HD 3 Buildings of Townscape Merit. In particular, given that the Middle Lane cottages fronting onto the site are Buildings of Townscape Merit, its inclusion would ensure “their settings [are] identified, protected, enhanced, and access improved where appropriate.”</p> <p>It would also support London Plan policy 3.16, and given its proximity to the elderly care day centre at Elleray Hall, London Play policy 3.18 and the Mayor's Social Infrastructure SPG (2015).</p> <p>It would support CP16 Local Services / Infrastructure, which states:</p> <p>"Provision of social infrastructure is a key part of the ‘social’ dimension of sustainable development in the NPPF which is about supporting strong, vibrant and healthy communities. One of the core planning principles of the NPPF is to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs’</p> <p>It would support a solution to the problem outlined in 8.3.17: "There is pressure on health facilities across the borough with some shortfall in GP floorspace in each of the four commissioning clusters in the borough and a need for greater provision of pharmacy services. Existing health facilities should be protected and the provision of new or</p>	<p>Comments noted. No changes required. See Officer response to Comment ID 9 and Comment ID 324 below. Also see the Officer response in the separate Proposal Map Changes document in relation to Comment ID 4.</p> <p>In relation to the comments on the GP surgery, it should be noted that the Council is working closely with the Richmond Clinical Commissioning Group to address this issue and consider all available options.</p>
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(<http://www.qni.org.uk/docs/GPN%2021%20Century%20Report%20FOR%20WEB.pdf>).

-The Infrastructure Delivery Plan, p.30: "These are challenging times for the health sector to maintain existing facilities and increase flexibility and choice to patients. Proposed new development will create an increased demand for health services that may not have been anticipated, which in places could create the need for additional capacity." This, similarly, cannot be met unless all appropriate sites are included in the Site Allocations Plan.

(3) It is not effective because the Site Allocations in the Local Plan do not include sites which would address the healthcare needs of the Borough, specifically in the Teddington Ward, despite these sites being council-owned and comparable in size to other sites which are included. As such, we do not believe that the Local Plan is deliverable in Teddington without the inclusion of this site in the Site Allocations.

There is already a significant lack of primary care healthcare space in Teddington, with the two surgeries located in the ward collectively having 574m² against a recommended size of 1370m², meaning they have 41.9% of the space NHS best practice guidance would suggest they should. This is significantly worse than the Borough average for GP surgeries of 63.0% of recommended space, and Park Road Surgery in particular are the second-most undersized practice despite having the second-largest list in the Borough.

One of the two GP surgeries in Teddington, Thameside Medical Practice, is currently looking to merge with another local practice, and this would mean the loss of their site to healthcare, leaving the ward even more critically short of space. If Thameside Medical Practice were to close, this would leave Teddington without a GP surgery compliant with the Disability Discrimination Act, and this would breach the Council's Equalities Impact Assessment, particularly section 3.8, which aims to make borough centres "more accessible to disabled people", and acknowledges "a need for further improvements both to the public realm and access to individual shops and services".

The current, and projected increases, in the needs of the borough's population are established in the Health Impact Assessment:

(1) the high proportion of people aged 65+ in the borough (Section 7.7: 13.5% vs. London average 11%), and that this "is likely to lead to an increase in demand on services"

(2) the high proportion of older people living alone (Section 7.9: 16% vs. London average 9%), and "increasing numbers of older people living at home with multiple long

improved facilities appropriate to local needs is encouraged. Applications for new or loss of health and social care facilities will be considered in line with the criteria of policy LP 28 in 8.1 'Social and Community Infrastructure'. The proposed use of the site for health was supported by 93.9% of the 709 respondents to our survey, and was the preferred site of 78.1%, giving an indication of the strength of support among our 13,100 patients.

term conditions”

(3) the resulting need for “more services[...]closer to home” (Section 7.24), and the whole section under the heading “Pressure on health infrastructure”

(4) “Richmond CCG’s priority is for provision of more health services based in the community” (7.24), and there is a need in the Teddington Ward for increased community space to accommodate these.

While these needs are recognised in the local plan, the current form of the plan prevents the council from acting in support of that need on the North Lane site despite other comparable sites being listed in the Site Allocations, and protected for uses where there is a recognised need for those uses, this has not happened for the North Lane site despite the surgery having been in negotiation with the council to acquire it since late 2014.

Why the plan fails the duty to co-operate

(1) Given that the council was aware of the increasing local healthcare need, and the intent to acquire the North Lane site, we suggest the site should have been explicitly discussed with Richmond CCG in keeping with The council’s duty to co-operate per para 1.2: “the provision of health, security, community and cultural infrastructure and other local facilities”, and para 2.3 “the provision of social infrastructure and other local facilities”.

(2) Similarly, the council have a duty to co-operate with (para 2) “the borough and its interrelationship with Greater London and the South East”. The Londonwide Better Health For London report (<http://www.londonhealthcommission.org.uk/our-work/publications/>) notes: “All of us should be ashamed at the state of many of London’s GP practices: the condition of most practices is ‘poor’ or ‘acceptable’, and a staggering three-quarters of London’s GP practices are in need of rebuild or repair.”

(3) Similarly, the council’s engagement with Prescribed Duty to Co-operate bodies, specifically Richmond CCG and NHS England, as set out in the duty to co-operate document in Appendix 7, notes: “the borough’s social infrastructure is at capacity and with population growth it is very important that sufficient land is secured for required social infrastructure uses, such as health facilities and children’s nurseries, to support the growth and development in the borough”. As such, we regard the failure to include the North Lane site in the Site Allocations list as a failure of the duty to co-operate.

28	19	Paul Mallon, Barnes Eagles Football Club	The following comments relate to the SA 24 Stag Brewery, Lower Richmond Road, Mortlake which is described in this paragraph of the consultation plan.	Yes	No	Yes					<p>The plan for the Stag Brewery Site is of great concern to Barnes Eagles Football Club - a youth football club which has been in active in the Borough since 1971. We have approximately 500 members. The football pitches on the Stag Brewery are used by the Club for training on Saturdays and for matches on Sundays. It is one of the two sites we use, the other being Barn Elms. The Club uses the site during the football season (September to early May) and has done so for at least the last fifteen years. We have occasionally used the site out of season for running soccer schools to develop new opportunities - for example girls participation The pitches are made available to us under licence from the owners (previously InBev and now Dartmouth). Barnes Eagles pays for the upkeep and maintenance of the grounds. The pitches are a vital asset to the Club and we have followed the proposals to re-develop the site for many years. The original Council supported plan included a primary school and would have kept the pitches as is. This would have suited the Club well - there would be no conflict between weekday and weekend use. We are concerned that keeping the pitches as they are and available for use will be compromised by building a much larger secondary school. We may be pleasantly surprised as we have not yet seen the developer's proposal but we understand, anecdotally, that the pitches will not be preserved in a way that would make them available for our continued use. Whilst we have noted the following statement to the pre-amble to SA24 as follows"including the retention and/or reprovision and upgrading of the playing field." which we would welcome we have seen no information to support this.</p>	<p>Comments noted. The Local Plan seeks to retain and/or reprovide and upgrade the existing playing field. The playing field is designated Other Open Land of Townscape Importance (OOLTI), which has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. The OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances. However, it should be noted that any such reprovision would have to be on this site and not off-site or elsewhere in the Mortlake area.</p> <p>To avoid confusion and to add clarity, the following minor change is proposed by amending the 10th bullet point of the supporting text as follows: "<u>Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. <i>This includes the retention and/or reprovision and upgrading of the playing field within the site.</i></u>"</p> <p>The Council will expect the developer to liaise with all users of the football pitches as part of the pre-application and planning application process.</p>
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25	122	Alison Horwood	<p>Omission My comments relate to the apparent omission of the development of Metropolitan Open Land in Heathfield / Whitton on the Bridge Farm Nursery site as the new site for the Turing House Free School. This site has already been identified by the council and accepted by cabinet along with a council press release. Whilst the development may be in the hands of the EFA, the redesignation of MOL to be allocated to a school building should be included in the Local Plan as should be associated additional infrastructure</p> <p><i>These comments were made on the Publication Local Plan but in the Council's view may be more appropriate to consider under the Proposals Map Changes.</i></p>	No	No					<p>The omission of the development of Metropolitan Open Land in Heathfield / Whitton on the Bridge Farm Nursery site as the new site for the Turing House Free School is not acceptable. This site has already been identified by the council and accepted by cabinet along with a council press release. Whilst the development may be in the hands of the EFA, the redesignation of MOL to be allocated to a school building should be included in the Local Plan as should be associated additional infrastructure</p>	<p>The proposed development and re designation of MOL, even if it still subject planning permission should be included as a future plan. The site and potential development should be included in the maps within the Local Plan</p>	<p>Comments noted. No changes required. Turing House School is already an established school in the borough. It is acknowledged that the school is currently in temporary accommodation. If a proposal for a school comes forward on the Bridge Farm Nursery site, which is designated MOL, it will need to be assessed against all the policies set out within the Local Plan as well as the London Plan and NPPF, including policies on Green Belt and Metropolitan Open Land. It is therefore considered that this is not a Local Plan matter, but that it will be for the developer/applicant to demonstrate as part of the planning application process that 'very special circumstances' exist that may outweigh harm to Green Belt / MOL.</p>
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24	94	Michael Goodman	Local Plan Proposals Map Changes Page numbers 3 & 4 Upney Park Road Playing Fields Chapter 12 - comment she in relation to other sites/site omissions Ref 475 - Allocation of new site - former Imperial College Private Ground, Upney Park Road, Teddington <i>These comments were made on the Publication Local Plan but in the Council's view may be more appropriate to consider under the Proposals Map Changes.</i>	No					I feel the councils re-designation of the site whilst it was aware of proposals being prepared for the future of the site by Quantum Developements, was taken without proper consultation on the views of the local residents. Indeed it was a calculated move to bypass the findings of a local consultation being undertaken by Quantum at the time and in that it was unsound.	The council must await the publication of the findings from local consultation undertaken by Quantum Developments	Comments noted. No changes required. See Officer response to Comment ID 9 and Comment ID 324 below. Also see the Officer response in the separate Proposal Map Changes document in relation to Comment ID 4.
33	7	Charlotte Andrew	Udney Park Rd playing fields. <i>These comments were made on the Publication Local Plan but in the Council's view may be more appropriate to consider under the Proposals Map Changes.</i>	Yes	Yes	Yes			The bullying tactics of Quantum should be resisted in their attempt to make money from their speculative acquisition of the playing fields on Udney Park. These playing fields should be retained and improved in their entirety to provide sports facilities for the enjoyment and benefit of local residents of all ages.		Comments noted. Support welcomed.

43	213	Stephanie Pemberton	Page 194 Paragraph 13.1.7	No	No	No	Yes	Yes	Yes	Yes	<i>See comment ID 40 on Publication Local Plan.</i>	Amend as follows 13.1.7 13.1.7 A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population. Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses: Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form of entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school	See Officer response to Comment ID 42 above.
47	250	Ella Sanders Smith	Paragraph 13.1.7 Page 194	No	No	No		Yes	Yes	Yes	<i>See comment ID 45 on Publication Local Plan.</i>	Amend as follows 13.1.7 13.1.7 A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population. Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses: Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 2-form of entry primary school Ryde House, East Twickenham: provision of a new 2-form of entry primary school Barnes Hospital, Barnes: provision of 2-form of entry primary school	See Officer response to Comment ID 42 above.

132	11	Anthony Atkinson	Publication Local Plan Page 194 Paragraph 13.1.7	No	No	No	Yes	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction. endorse the views expressed by Mortlake Brewery Community Group in its representation(s).]</p>	<p>13.1.7 A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population. Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses:</p> <ul style="list-style-type: none"> - Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college - Stag Brewery, Mortlake: provision of a new 2-form of entry primary school - Ryde House, East Twickenham: provision of a new 2-form of entry primary school - Barnes Hospital, Barnes: provision of 2-form of entry primary school 	<p>See Officer response to Comment ID 42 above.</p>
145	135	Alistair Johnston	Publication Local Plan Page 194 Paragraph 13.1.7	No	No	No	Yes	Yes	Yes	Yes	<p>Note: In relation to sections 4 and 5 above, I have checked all boxes which, in my opinion, are, or could potentially be, relevant to the representations made in this section 6. If and to the the duty to co-operate (box 4.(3)) applies, the proposed corrections to the Local Plan in section 7 should be disregarded as such matters are not capable of correction.</p> <p>I endorse the views expressed by Mortlake Brewery Community Group in its representations</p> <p>In addition, I would emphasise that the density of the proposed Brewery development is crazy... the Brewery site should be used for a Secondary School OR a housing development, not both... the traffic and transportation issues of both will cause a Perfect Storm of congestion and overcrowded public transportation in this already very busy part of the Borough...</p> <p>I would also like to take issue with the loss of the "Green Corridor" to the river which was a key component of the 2011 development plan... this would make a huge difference to the Mortlake area and it would be a tragedy if the one in a lifetime chance to create this great public amenity was lost...</p>	<p>13.1.7 A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population. Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses:</p> <ul style="list-style-type: none"> - Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college - Stag Brewery, Mortlake: provision of a new 2-form of entry primary school - Ryde House, East Twickenham: provision of a new 2-form of entry primary school - Barnes Hospital, Barnes: provision of 2-form of entry primary school 	<p>See Officer response to Comment ID 42 above.</p> <p>In addition, it should be noted that Other Open Land of Townscape Importance (OOLTI) has been identified for protection, and where possible enhancement, as it contributes to the local character and townscape by providing openness in built up areas. The OOLTI policy recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, including educational schemes, it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances.</p> <p>It is considered that the broad approach to SA 24 is sufficiently detailed in relation to the nature and scale of development, in line with national planning guidance. Policies need to be sufficiently flexible, for example to take account of changing</p>

21	41	Simon Cartmel I	Paragraph 13.1.9 Well it's clear that the Council is unwilling to work collaboratively to develop play and sports spaces per the Udney Road Playing Fields issue.	No						As previously stated the Council are set against any development of the Udney Park site despite the potential to create a fantastic community centre and sports field as required by local residents.	There needs to be a proper debate regarding this site not the imposition of Local Green Space designation via a sham consultation exercise.	<p>Comments noted. No changes required. See Officer response to Comment ID 9 and Comment ID 324 above Also see the Officer response in the separate Proposal Map Changes document in relation to Comment ID 4.</p> <p>In addition, it should be noted that statutory consultation has been carried out. As part of the Pre-Publication consultation, an application from a local community group has been received by the Council for the designation of Udney Park Playing Fields as Local Green Space designation. Public consultation on the proposed Local Green Space designation was carried out by the Council as part of the Regulation 19 consultation earlier in 2017.</p> <p>In line with paragraph 76 of the NPPF, "local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances." In addition, it states that "Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period." Therefore, the proper processes for applying for a Local Green Space designation and consulting on it have been followed.</p>
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253	69	Samantha Powell, Education Funding Agency	Infrastructure Policies							<p>The EFA was established in 2012 in order to help the government achieve its schools objectives by delivering effective capital programmes that improve the condition of existing buildings and support the creation of new places for pupils and learners. We manage £54 billion of funding a year to support all state-provided education for 8 million children aged 3 to 16, and 1.6 million young people aged 16 to 19.</p> <p>The EFA aims to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. As such, we would like to offer the following comments in response to the proposals.</p> <p>The EFA support reference within paragraph 13.2.3 to delivery of appropriate social and community infrastructure to support sustainable development and within 8.1 (Community facilities) specific reference to the need to deliver school places, particularly for primary provision, in the longer-term. You will have no doubt taken account of the key strategic policies to reiterate this position, but it would be helpful if they were explicitly referenced within the document.</p>	<p>In particular: National The <i>National Planning Policy Framework</i> (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72). The EFA support the principle of LB Richmond safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary. LB Richmond should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on '<i>Planning for Schools Development</i>' (2011) (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.</p>	<p>Comments noted. Support for paragraph 13.2.3 is welcome. It is not considered appropriate to repeat within the Local Plan national policy and guidance. No changes required.</p>
398	266	Dale Greetham, Sport England	13 Implementation - 13.2 Infrastructure Delivery - Infrastructure Delivery Plan - 13.2.8	No						<p>Please see Sport England's comments are previously submitted. These remain relevant and valid.</p> <p><i>Please see Appendix 21 in this document for a PDF version of the comments referenced above.</i></p>	<p>It is noted that Sport England seeks specific reference to sport facilities needed within this section. It is not considered appropriate to include all infrastructure needs and requirements within this section as these are already included within the Infrastructure Delivery Plan (last updated April 2017). The Infrastructure Delivery Plan is a living document and capable of being updated as and when required, for example when there is a change in circumstances. No changes required.</p>	

257	69	Samantha Powell, Education Funding Agency	Developer Contributions and CIL								<p>There is a need to ensure that education contributions made by developers are sufficient to cover the increase in demand for school places that are likely to be generated by major developments in the borough. The EFA acknowledges LB Richmond has been charging CIL since 2014 and identifies the role of CIL in funding new community facilities, including schools, in the borough. The EFA support this approach in addition to ensuring appropriate developer contributions are secured through s106 agreements.</p> <p>The EFA support the inclusion of primary, secondary and special education provision on Richmond’s CIL Regulation 123 list. The EFA would be particularly interested in responding to any review of infrastructure requirements, CIL draft charging schedule and any subsequent CIL review and/or amendments to your Regulation 123 list. As such, please add me to your database as the EFA contact for both Local Plan and CIL consultations.</p> <p>Finally, I hope the above comments are helpful in shaping LB Richmond Local Plan, with particular regard the provision of land for new schools. Please advise the EFA of any proposed changes to Local Plan policies, supporting text, site allocations or evidence base arising from these comments.</p>		<p>Comments noted. No changes required. The Education Funding Agency is included within the Local Plan database and will be consulted on any future Local Plan or CIL consultations.</p>
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