

# Local Plan Direction of Travel Consultation

*It is less than two years since the Council adopted the present Local Plan, but much has happened since. In response to the accelerating pace of climate change the Council has adopted a Climate Emergency Strategy with a range of actions, some of which have a direct bearing on Local Plan policies.*

*There has also been a revision of the National Planning Policy Framework and a new London Plan is in its final stages before adoption with, amongst other things, increased housing targets albeit not at the unrealistic levels first mooted. Within those targets the achievement of the desired proportion of affordable accommodation remains elusive.*

*Another major issue is that although our town centres have so far proved more resilient than most to changes in shopping habits, we need to consider whether greater policy flexibility is desirable.*

*These and many other issues are set out in this Direction of Travel document. We are anxious to have the views upon it of our residents and those who work or study in the borough.*

**Councillor Martin Elengorn**  
**Chair of the Environment, Sustainability, Culture and Sports Committee**

## **What is a Local Plan?**

We are now starting to prepare a new Local Plan for Richmond borough. This consultation document sets out our initial thoughts about what the scope of the new Plan should be and the planning issues that should be addressed.

The Local Plan is the key planning document for the borough. It will set out policies and guidance to shape our places, plan and manage growth and guide development across the borough over a 15-year period. We will use the Local Plan to guide our decisions on the location, amount and type of development the borough needs to accommodate growth. It will also set out which places will be protected, and which places will change. Ultimately, the Local Plan will be the main document against which we assess planning applications.

## **Why do we want to hear from you?**

This Direction of Travel document is the first stage in our engagement process with residents, businesses and other stakeholders.

We want to hear your views as to how the borough should accommodate growth and what our future strategic vision should be for the borough. The borough is facing a number of key challenges, opportunities and critical planning issues. This document sets out what we think they are, and how they could be included in a new Local Plan. Please tell us if you agree, or if we have missed any opportunities or issues you think need to be addressed in the new Local Plan.

## **Why do we need a new Local Plan?**

In the last two years there have been changes to national planning policy and the new London Plan is in its final stages before adoption and will affect housing targets. The Council has adopted a Climate Emergency Strategy with a range of actions some of which have a direct bearing on Local Plan policies, as will other changes to the environment and economy.

## **Have your say**

The Local Plan Direction of Travel consultation document can be viewed at <https://haveyoursay.citizenspace.com/richmondccs/local-plan-20>, at any borough library or at the Civic Centre in Twickenham.

Please give us your views on the consultation document by:

- Completing the online questionnaire at the link above, or
- By email to [LocalPlan@richmond.gov.uk](mailto:LocalPlan@richmond.gov.uk), or
- By post to Policy and Design, London Borough of Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ

Any comments should be received by the Council no later than **Sunday 22 March**.

If you need a copy of the questionnaire in hard copy or any other format, please contact us.

*Please note that your response will not be treated as confidential and any anonymous responses will be discarded. A summary of the responses will be made available following the consultation period. These responses will be fully considered and taken account of when preparing the Local Plan.*

There will also be further engagement opportunities to let us know your views later in 2020.

## **Related consultations**

### **Draft Sustainability Appraisal Scoping Report (February 2020)**

The purpose of Sustainability Appraisal is to consider the likely social, environmental and economic impacts of the emerging plan, and it also incorporates the requirements of the Strategic Environmental Assessment (SEA). As part of the preparation of a new Local Plan, the Council has reviewed and updated its Sustainability Appraisal Scoping Report, which identifies the scope and level of detail of the information to be included in the Sustainability Appraisal. The Council is seeking views on the draft report from the three statutory consultees with environmental responsibilities in England (i.e. Historic England, Natural England, and the Environment Agency). Other relevant stakeholders with a sustainability remit or a local interest are also able to review the report and submit representations at:

[https://www.richmond.gov.uk/services/planning/planning\\_policy/local\\_plan/new\\_local\\_plan\\_direction\\_of\\_travel\\_engagement](https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/new_local_plan_direction_of_travel_engagement)

## Call for Sites

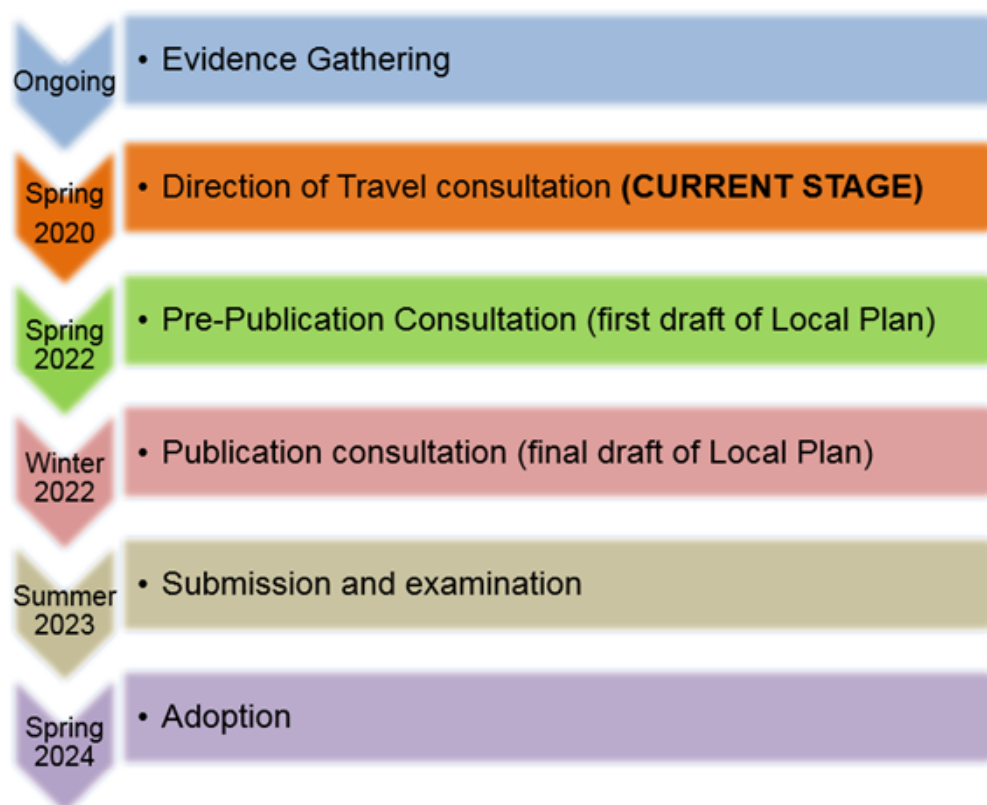
The Council is required by Government guidance to issue a call for sites and broad locations for development as part of the preparation of the new Local Plan. This is to identify as many potential opportunities as possible, aimed at as wide an audience as possible so that those not normally involved in property development have the opportunity to contribute. There is a call for sites and broad locations alongside this consultation, so that we will have a better understanding, at this early stage in preparing the Plan, what land may become available during the Local Plan period and understanding of deliverability. Please note that the 'call for sites' exercise does not mean that the Council will have to allocate the suggested sites for development, but the Council will be able to assess from a potentially large number of sites their suitability, availability and deliverability.

You (individuals, landowners, developers, businesses, local groups) are invited to put forward sites for consideration at: <https://haveyoursay.citizenspace.com/richmondcs/call-20>

## What happens next

We are required to follow statutory processes when developing a Local Plan.

The stages in the preparation of a new Richmond Local Plan are set out below:



The new Local Plan is anticipated to be adopted in 2024, at which point it will supersede the existing Local Plan (2018) and the Twickenham Area Action Plan (2013). The West London Waste Plan (2015) and the Ham & Petersham Neighbourhood Plan (2019) will not be superseded by the new Local Plan.

## **Questionnaire**

You will need to complete the *Publishing/privacy statement and your details* section below before you can answer any of the questions on the Local Plan.

### ***A. Publishing/privacy statement and your details***

The Council is committed to ensuring that personal data is processed in line with GDPR data protection principles including keeping data secure. The Council's Privacy Notice is published on the webpage [www.richmond.gov.uk/data\\_protection](http://www.richmond.gov.uk/data_protection)

By commenting on this consultation, you are agreeing that your comments (or comments that you are making on behalf of an organisation) can be made public in a consultation report that will be published on the Council's website, along with your name (and if applicable whom you respond on behalf of).

We hope that you or your organisation will continue to take an interest in, and contribute to future planning policy and design policy. Respondents to consultations who have not previously responded to us will be added to the Local Plan Consultee Database, unless a request has been made to the contrary. If you would prefer not to receive notifications regarding planning policy and design matters from us, then please notify us, preferably by email to [LocalPlan@richmond.gov.uk](mailto:LocalPlan@richmond.gov.uk)

#### **1. What is your name?**

*(Required)*

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#### **2. What is your email address?**

*(Required)*

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#### **3. In what capacity are you responding to this consultation?**

*(Required)*

- As an individual
- On behalf of... (please specify below)
- Other (please specify below)

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**B. Introduction**

In this part of the consultation you can make comments on the *Introduction*, whether positive or negative. You may wish to come back to this question when you have read other parts of the document.

**4. Please tell us any comments you would like to make about the Introduction:**

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**5. Does this document raise any specific equality impacts which would affect particular groups or communities of people in Richmond?**

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**C. Scale of the challenge, opportunities and setting the Direction of Travel**

In this part of the consultation you can make comments on the *Scale of the challenge, opportunities and setting the Direction of Travel*.

**6. What challenges do you think Richmond borough faces now and in the future?**

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**7. How might our role in London change in the future?**

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**8. What do you think should be our priorities in the new vision?**

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**9. Have we covered all the key issues and overarching challenges facing the borough in the ten themes above?**

- Yes
- No
- Don't know

**10. Please tell us if you think there is anything missing:**

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**11. In addition to our existing approaches of directing larger scale development to the borough's town centres, and expecting the majority of development on brownfield sites, where should we direct new growth in the borough?**

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**12. Should we continue to protect our green and open spaces from inappropriate development, or are there parts of the borough that could assist in accommodating growth?**

*Please select only one answer:*

- Continue to protect our green and open spaces from inappropriate development
- There are there parts of the borough that could assist in accommodating growth

If you think there are there parts of the borough that could assist in accommodating growth, please tell us more here:

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**13. Which areas of the borough do you think are capable of taking more growth than others, for example based on their proximity to town centres and stations?**

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**14. Which areas of the borough may be suitable for more infill development and intensification?**

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**15. Are there parts of the borough that could be transformed through larger scale development and encouraging intensification (for example redevelopment of existing single dwellings to blocks of flats)?**

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**16. Would you like to see individual policies and strategies for each of the different parts of the borough (such as Twickenham, Kew, Barnes, Hampton and Hampton Hill etc)?**

- Yes
- No
- Don't know

**If yes, how could they vary?**

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**17. Can you suggest any other ways we could accommodate future growth and new development, ensuring support for sustainable communities?**

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***D. Responding to the climate emergency and taking action***

In this part of the consultation you can make comments on *Responding to the climate emergency and taking action*.

**18. Do you agree with the proposed policy directions?**

- Yes
- No
- Don't know

**If you disagree with any of the policy directions, please tell us more here:**

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**19. How can we promote high quality sustainable development as part of a new Local Plan?**

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**20. How can we continue to set out a pathway to zero carbon?**

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**21. How ambitious shall we be in requiring zero carbon standards for all developments?**

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**22. Are there other planning means to mitigate and adapt to climate change that you want us to pursue?**

- Yes
- No
- Don't know

**If yes, please tell us more here:**

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**23. Are there any other climate change and/or sustainability issues that you would like the new Local Plan to address?**

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**E. Delivering new homes and an affordable borough for all**

In this part of the consultation you can make comments on *Delivering new homes and an affordable borough for all*.

**24. Do you agree with the proposed policy directions?**

- Yes
- No
- Don't know

**If you disagree with any of the policy directions, please tell us more here:**

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**25. What do you think are priorities for the type and size of new dwellings?**

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**26. Could other forms of housing assist with meeting local needs?**

- Yes
- No
- Don't know

**If yes, please tell us more here:**

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**27. Would you support housing delivery from small sites, if it is of good design and contributes to local infrastructure?**

- Yes
- No
- Don't know

**28. What other ways could help deliver more affordable housing, in the right locations, given land values and property prices in the borough, and recognise the wider community benefits it brings?**

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***F. Shaping and supporting our town and local centres as they adapt to changes in the way we shop***

In this part of the consultation you can make comments on *Shaping and supporting our town and local centres as they adapt to changes in the way we shop*.

**29. Do you agree with the proposed policy directions?**

- Yes
- No
- Don't know

**If you disagree with any of the policy directions, please tell us more here:**

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**30. Do you agree with the spatial strategy proposed?**

- Yes
- No
- Don't know

**Should major development be encouraged equally amongst the five town centres? Or should for example, Richmond and Twickenham be the appropriate location for the majority of any new retail floorspace?**

**Please use this space to give us your comments:**

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**31. Does the existing hierarchy categorise borough centres correctly?**

- Yes
- No
- Don't know

**Are there too many local centres and parades in this defined centre hierarchy? Local centres, neighbourhood centres and parades are relatively well spread across the borough. However, should we reduce the number of centres in the hierarchy, and/or reduce the amount of/or completely remove designated frontages in some, taking into account their role in meeting local need?**

**Please use this space to give us your comments:**

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**32. If the evidence supports a more flexible approach to retail policies, what other uses should be encouraged?**

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**33. Would housing, including residential on upper floors, work if located next to other (potentially noisy or smelly) uses in centres work? Where might a relaxed policy to encourage more housing apply? Should it, for example, apply in designated frontages?**

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**34. In terms of developing centre strategies and visions, what should they include? How should these relate to local and wider transport accessibility? Your views in relation to specific centres are welcomed.**

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**35. Should the amount of key shopping frontages be reduced and/or should secondary shopping frontages (where some change of use is already allowed) also be reduced or removed altogether? Do we need to protect shopping in just the core areas which correspond with designated key shopping frontages?**

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**36. Should the 'key shopping area' relating to the operation of permitted development rights continue to be both key and secondary frontages?**

- Yes
- No
- Don't know

**37. Is it appropriate to continue to protect local top- up shopping facilities?**

- Yes
- No
- Don't know

**Should this protection only extend to food shops and/or some selected types of businesses?**

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**Is 400 metres an appropriate proxy for easy walking distance?**

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**Should we continue to provide additional protection for shops selling essential goods and Post Offices generally?**

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**38. Do we need to continue to protect pubs as strongly?**

*Some pubs that do not have a food offer are struggling to stay open, despite their potential value to the community*

- Yes
- No
- Don't know

**Please use this space to tell us more:**

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**39. Are the locally set thresholds for impact and sequential tests still appropriate?**

- Yes
- No
- Don't know

**Please use this space to tell us more:**

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**40. How long should shops and pubs be marketed before a change of use is allowed if the proposal is contrary to policy?**

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**41. Should a policy be developed for redevelopment of existing retail parks/stores in less central locations?**

- Yes
- No
- Don't know

**Please use this space to tell us more:**

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***G. Increasing jobs and helping business to grow***

In this part of the consultation you can make comments on *Increasing jobs and helping business to grow*.

**42. Do you agree with the proposed policy directions?**

- Yes
- No
- Don't know

**If you disagree with any of the policy directions, please tell us more here:**

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**43. Should we continue to protect our industrial-type uses?**

- Yes
- No
- Don't know

**Please use this space to tell us more:**

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**44. Should we take a proactive approach and encourage intensification, or adopt a more locally distinctive policy in this regard that focuses less on introduction of residential on industrial sites, but that encourages further industrial / employment uses?**

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**45. Should we continue to specify flexible small-scale units suitable to meet local business needs?**

- Yes
- No
- Don't know

**Please use this space to tell us more:**

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**46. What priority should we give to employment uses over residential amenity, if at all?**

*For example, a business park may be underutilised due to neighbours' objections to potential transport impacts.*

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**47. What type of sites, buildings and facilities are most needed to support the borough's office occupiers, in particular its small and micro businesses, as well as those working remotely from their usual place of work?**

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**48. Should we encourage and protect river-related business?**

- Yes
- No
- Don't know

**Please use this space to tell us more:**

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### ***H. Protecting what is special and improving our areas***

In this part of the consultation you can make comments on *Protecting what is special and improving our areas*.

**49. Do you agree with the proposed policy directions?**

- Yes
- No
- Don't know

**If you disagree with any of the policy directions, please tell us more here:**

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**50. Are our current policies strong enough to ensure the ongoing protection of the borough's historic assets?**

- Yes
- No
- Don't know

**If no, please tell us more:**

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**51. Do you agree that we should actively identify opportunities for development and/or redevelopment where these can result in improvements to the character and appearance of existing conservation areas?**

- Yes
- No
- Don't know

**52. Are there other opportunities through planning to enhance the cultural offer and widen participation?**

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**53. Do you agree that the MOL and Green Belt boundary review should also incorporate a review of designated Other Open Land of Townscape Importance?**

- Yes
- No
- Don't know

**Please use this space to tell us more:**

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**54. Are there any sites that you would like to be identified for designation as ‘Local Green Space’?**

*Local communities can identify green or open space which is of special quality and holds particular significance and value to the local community which it serves in accordance with the NPPF. If sites are suggested to the Council for designation as Local Green Space, the Council will then undertake a robust analysis of such sites against the criteria of the NPPF and objectively assess sites in relation to, for example, beauty, historic significance, recreational value etc. to consider whether this designation could be applied.*

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***I. Increasing biodiversity and the quality of our green spaces, and greening the borough***

In this part of the consultation you can make comments on *Increasing biodiversity and the quality of our green spaces and greening the borough*.

**55. Do you agree with the proposed policy directions?**

- Yes
- No
- Don't know

**If you disagree with any of the policy directions, please tell us more here:**

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**56. Do you agree with our overall policy directions for protecting and enhancing our biodiversity as well as recognising the contribution that green infrastructure and urban greening make to tackling climate change?**

- Yes
- No
- Don't know

**Please use this space to tell us more:**

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**57. Do you agree that we should develop our own Urban Greening Factor model rather than relying on the generic London-wide model?**

- Yes
- No
- Don't know

**Please use this space to tell us more:**

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**58. Do you agree with the introduction of the biodiversity net gain requirement?**

- Yes
- No
- Don't know

**If so, do you have any suggestions on how this can be secured?**

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***J. Improving design, delivering beautiful buildings and high-quality places***

In this part of the consultation you can make comments on *Improving design, delivering beautiful buildings and high-quality places*.

**59. Do you agree with the proposed policy directions?**

- Yes
- No
- Don't know

**If you disagree with any of the policy directions, please tell us more here:**

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**60. How should the Urban Design Study identify areas for change and locations where tall buildings and/or high density development may be appropriate?**

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**61. Should design review be embedded as one of the policy tools to inform determination of planning applications?**

- Yes
- No
- Don't know

**What other tools may be useful to assess the design quality of proposed schemes?**

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**62. Should we develop our own borough-wide design guide to assist delivering high quality design, and what are the local areas' qualities and opportunities?**

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**63. Do you have any views as to how the design and development of homes could address different lifestyles, abilities and stages of life, including an ageing population?**

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**K. Reducing the need to travel and improving the choices for more sustainable travel**

In this part of the consultation you can make comments on *Reducing the need to travel and improving the choices for more sustainable travel*.

**64. Do you agree with the proposed policy directions?**

- Yes
- No
- Don't know

**If you disagree with any of the policy directions, please tell us more here:**

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**65. What measures need to be put in place if the Council is to support car-free and car-lite development in areas with currently lower levels of access to public transport?**

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**66. What additional facilities does the borough need to support greater levels of walking and cycling?**

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**67. If the availability of parking in the borough's town centres was less than it is now, would it encourage you to walk, cycle or use public transport more?**

- Yes
- No
- Don't know

**Please use this space to tell us more:**

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**68. Should the Council actively pursue alternative uses (such as much needed affordable housing, employment space and/or social and community infrastructure uses) on its existing car parks in town centres?**

- Yes
- No
- Don't know

**Please use this space to tell us more:**

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***L. Securing new social and community infrastructure to support a growing population***

In this part of the consultation you can make comments on *Securing new social and community infrastructure to support a growing population*.

**69. Do you agree with the proposed policy directions?**

- Yes
- No
- Don't know

**If you disagree with any of the policy directions, please tell us more here:**

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**70. Is there a need for a particular type of community facility in your local area?**

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**71. What is the best way to provide enough school places for our growing population?**

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**72. Should we encourage more community uses in borough centres?**

- Yes
- No
- Don't know

**Should they be encouraged as part of larger or mixed use developments?**

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**73. Should there be increased public access to school facilities?**

- Yes
- No
- Don't know

**Please use this space to tell us more:**

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***M. Creating safe, healthy and inclusive communities***

In this part of the consultation you can make comments on *Creating safe, healthy and inclusive communities*.

**74. Do you agree with the proposed policy directions?**

- Yes
- No
- Don't know



**If you disagree with any of the policy directions, please tell us more here:**

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**75. Should it be easier to change use from other land uses to community uses?**

- Yes
- No
- Don't know

**Please use this space to tell us more:**

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**76. Should policy strongly resist more takeaways in areas in proximity to schools?**

- Yes
- No
- Don't know

**Please use this space to tell us more:**

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**77. Do you have any other suggestions on how planning can promote or contribute to creating places and an environment that is conducive to weight loss and active lifestyles?**

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**78. Are there other opportunities through planning to promote healthy lifestyles?**

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**79. How can we ensure convenient and welcoming development with no disabling barriers, providing independent access without additional undue effort, separation or special treatment?**

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***N. Towards implementation, infrastructure, delivery and sites***

In this part of the consultation you can make comments on *Towards implementation, infrastructure, delivery and sites*.

We are interested to hear any general views about the market and how to maintain supply and delivery. Historically, there have been high implementation rates in the borough, as sites with permission are generally built out.

**80. Are there are any barriers to delivery, such as infrastructure constraints?**

- Yes
- No
- Don't know

**If yes, do these affect any particular or common types of development, such as small sites?**

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## **O. About you**

*The following questions will help the Council to improve its services and be fair to everyone who lives in the borough. The information you provide will be used for statistical and research purposes only and will be stored securely. If there are any questions you do not wish to answer, please move on to the next question.*

### **81. Are you:**

- Male
  - Female
  - Prefer not to say
  - Prefer to self-describe:
- .....

### **82. What was your age last birthday?**

- 19 and under
- 20-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65-74
- 75+
- Prefer not to say

### **83. Do you consider yourself to have a disability?**

- Yes
- No
- Prefer not to say

### **84. How would you describe your ethnic group?**

- White
  - Mixed/multiple ethnic groups
  - Asian or Asian British
  - Black/African/Caribbean/Black British
  - Prefer not to say
  - Other ethnic group, please specify:
- .....

**85.** Please indicate your sexual orientation:

- Heterosexual / straight
  - Gay man
  - Gay woman / lesbian
  - Bisexual
  - Prefer not to say
  - Prefer to self-describe:
- .....

**86.** Do you belong to a religion or faith group?

- No
  - Yes, Christian
  - Yes, Buddhist
  - Yes, Hindu
  - Yes, Jewish
  - Yes, Muslim
  - Yes, Sikh
  - Prefer not to say
  - Yes, other (please specify):
- .....

Thank you for taking part in the consultation.

Please return your completed questionnaire by **22 March 2020** to:

Planning Policy Team  
Richmond Council  
2<sup>nd</sup> Floor, Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ