

Consultation from 24 February until 5 April 2020

Published by LBRuT November 2020

Please note, the responses below are exactly as received from the respondents and have not been edited by the Council.

They are not alphabetically ordered or in any other order of priority.

The schedule shows where any personal information within responses relating to contact details, particularly full address data, has been removed stating e.g. *[personal details removed for data protection]* or shown as black rectangles in the appendices.

Appendices have been made available separately where due to the length or nature of responses they could not be captured within the main Schedule. The officer references added are shown in the Schedule as *[See Appendix....]*

Respondent reference no.	Name / Organisation
1.	David Mattes
2.	CBRE on behalf of LGC Ltd, Teddington
3.	Katie Parsons, Historic England
4.	Lambert Smith Hampton on behalf Metropolitan Police Service
5.	Helen Monger, London Parks & Gardens Trust
6.	Marine Management Organisation
7.	Michael P Martin, Milestone Commercial
8.	Sharon Jenkins, Natural England
9.	Shirley Meaker
10.	Stuart Morgans, Sport England
11.	Surrey County Council
12.	Tim Lester
13.	Heather Archer, Highways England
14.	Mayor of London
15.	Transport for London (TfL)
16.	Avison Young on behalf of National Grid
17.	Hannah Bridges, Spelthorne Borough Council
18.	Phoebe Juggins, Department for Education
19.	DP9 Ltd on behalf of London Square Developments

Respondent reference no.	Name / Organisation
20.	Gary Backler, Friends of the River Crane Environment (FORCE) (and supported by Crane Valley Partnership)
21.	Lucy Wakelin, Transport for London (TfL) Commercial Development
22.	Jimmy Wallace, Richmond Athletic Association
23.	Peter Willan & Paul Velluet on behalf of Old Deer Park Working Group
24.	Paul Velluet
25.	Phoebe Quayle
26.	Hannah Lukacs
27.	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)
28.	Alice Shackleton on behalf of The Kew Society
29.	Richmond Cycling Campaign
30.	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs
31.	Tim Catchpole on behalf of the Mortlake with East Sheen Society
32.	Mark Jopling on behalf of Udney Park Playing Fields Trust

Respondent reference no.	Name / Organisation
33.	Tim Catchpole on behalf of the Mortlake Brewery Community Group
34.	DP9 Ltd on behalf of Harlequin Football Club Limited
35.	Alice Roberts, CPRE London
36.	Rebecca Marwood, NHS Property Services Ltd
37.	John Waxman, Crane Valley Partnership
38.	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum
39.	Solomon Green
40.	Jamie Edwards
41.	Anthony Swan
42.	Jeremy Gill
43.	Paul Hart Prieto
44.	Roger Cutler
45.	Sally Beeson
46.	Joan Gibson
47.	Trevor Rowntree
48.	Roger Wilson on behalf of Roger Wilson Consulting LLP
49.	Margaret Edwards
50.	John O'Brien
51.	Su Bonfanti
52.	Winston W Taylor
53.	Richard Woolf on behalf of McDaniel Woolf Architects
54.	Paul Luton
55.	Jon Rowles
56.	Rob Kennedy, Environment Agency
57.	Tom Clarke, Theatres Trust
58.	Michael Atkins, The Port of London Authority
59.	Paul Massey
60.	Kingsley Izundu, Royal Borough of Kingston upon Thames
61.	Tom Minns

Respondent reference no.	Name / Organisation
62.	Kathleen Massey
63.	Carol Rawlings
64.	Johanna Eschbach on behalf of RiBRA (Richmond Bridge Residents Association)
65.	SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited
66.	Robert Philip Cunliffe
67.	William Mortimer
68.	Mark Jopling
69.	Geoff Bond on behalf of Ham & Petersham Association
70.	Melissa Compton-Edwards
71.	Patrick Wood

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

## Detailed comments as received:

Respondent reference no.	Name / Organisation	Detailed comments
<b>Introduction</b>		
<b>Comments about the Introduction</b>		
14	Mayor of London	<p>As you are aware, all Development Plan Documents in London must 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 detailed comments which are set out below. Transport for London (TfL) has provided comments, which I endorse, and are attached at Annex 1. <b>[See respondent number 15 for TfL comments]</b></p> <p>The Mayor is pleased to have the opportunity to comment on this early, non-statutory consultation to inform the development of Richmond's new Local Plan. This letter provides advice and sets out where Richmond should alter its proposed approach to be more in line with the Intend to Publish London Plan.</p> <p><b>The draft new London Plan</b></p> <p>As you know, the Mayor published his draft new London Plan for consultation on 1st December 2017. The Panel's report, including recommendations, was issued to the Mayor on the 8th October 2019 and the Intend to Publish London Plan was published on 17th December 2019. The Mayor has received the response from the Secretary of State to his Intend to Publish London Plan and is considering his response. In due time, my officers will be happy to discuss any implications for Richmond's Local Plan.</p> <p>Publication of the final version of the new London Plan is anticipated in the Summer, at which point it will form part of Richmond's Development Plan and contain the most up-to-date policies.</p> <p>Richmond's new Local Plan will be required to be in general conformity with the new London Plan. The Intend to Publish London Plan and its evidence base are material considerations in planning decisions.</p> <p><b>General</b></p> <p>The Mayor recognises that this is a non-statutory consultation and is a pre-cursor to the formal Regulation 18 draft of the Local Plan which is to follow. The ten themes identified early in the Direction of Travel document are welcome and give an indication of what the strategic priorities and ambitions are for the forthcoming Local Plan. It has only been two years since the adoption of Richmond's most recent Local Plan and since then there have been many new challenges, changing priorities and key shifts in the evolving planning landscape which Richmond intends to address. The Mayor welcomes Richmond's early thinking and work on a new Local Plan and recognises this is important to address housing delivery and ensuring the demand for other land uses can be met.</p>
19	DP9 Ltd on behalf of London Square Developments	<p><b>Comments on the Direction of Travel Document</b></p> <p>We consider the Local Plan Direction of Travel Consultation document to be an important and positive first stage in determining the borough's vision for growth and future development. It rightly identifies that much has changed since adoption of the latest Local Plan in 2018, particularly in terms of increased housing delivery targets. We provide our comments on the proposed direction of travel below, including opportunities to meet stated objectives.</p> <p><b>Why do we need a new Local Plan? – p.4</b></p> <p><b>Reason 1</b></p> <p>We support Richmond's actions to tackle the climate emergency and supports planning policy that will minimise carbon emissions, waste and pollution. Environmental impacts arising from pollution is particularly relevant to the subject Site. Its current industrial use has the potential to generate high levels of commercial vehicle traffic and therefore significant air quality impacts to surrounding residential uses. As part of the approach to tackling pollution, consideration must be given to protecting established residential communities from poor air quality.</p> <p><b>Reason 2</b></p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>We support the provision of infrastructure that will ensure better connectivity and encourage sustainable modes of transport. As part of this approach, development must be directed to appropriate locations. In the case of the subject Site, it is not sustainably located for large-scale employment use, particularly in light of its poor access via residential roads.</p> <p><b>Reason 3</b> We support Richmond’s consideration of how it will meet the new increased housing targets proposed in the draft London Plan. We consider that the Site should be assessed for this purpose, particularly in light of the proposal which seek to deliver 116 new homes including circa 57 units of affordable housing (49% of units).</p> <p><b>Reason 4</b> We support Richmond’s approach to ensuring alignment with the latest national planning policies, guidance and legislation.</p> <p><b>What do we already know? – p. 6</b> The consideration of viability through the plan-making process, and whether policies will stop development coming forward, is supported. This is particularly relevant to the sites, such as the subject Site, where restrictive policies may halt otherwise appropriate development from coming forward. Viability and market signals must also be considered in the preparation of policies which seek to protect certain uses. In the case of the subject site, its employment use is protected by adopted policy despite it having been demonstrated that the redevelopment of the Site for similar employment generating uses would be an unviable prospect. Without this approach, sites around the borough are at risk of long-term vacancy. This approach also presents a missed opportunity to redevelop brownfield sites to meet housing need.</p>
22	Jimmy Wallace, Richmond Athletic Association	<p>To provide a brief background, 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 hosting sporting activities ever since. The ground is home to two of the most recognised rugby clubs in the country (Richmond Rugby &amp; 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>In addition to the several thousand members of the two Rugby Clubs, RAA hosts a number of Rugby 7s tournaments such as the Lloyds Insurance 7s, Surveyors 7s, Law Society 7s, Middlesex 7s Festival and Summer Social. In addition, it has strong connections with the local business community and also provides facilities for the adjacent Falcons Boys School. Given the level of current usage and demand experienced by RAA, together with the condition and age of the existing facilities, it is evident that significant improvements are required if this vital facility for the local community is to continue to sustain itself and thrive. Whilst the facility is heavily used and makes a vital contribution to local health and well-being, it does not generate any surplus income that could be used to meaningfully invest in the provision of the significant enhancements that are needed to maintain this contribution. As such, it is clear that other funding solutions must be considered to deliver the required investment and uplift that the facilities require.</p> <p>In 2017, Richmond Rugby established a full-time Community Department which now provides rugby and sports coaching in over 20 primary and secondary schools, primarily in the state sector, in the borough of Richmond and further afield into west London. In addition, the Community Department formed a partnership the following year with HM Young Offenders Institution in Feltham to provide rugby coaching to juvenile offenders aged between 15 and 18, and this on-going programme was the first-ever outside sports project to be offered for this age group at the institution. More recently, the Community Department has been offered a sizeable grant from the Met Police to provide sports coaching as an after-school activity to 10-11 year olds in partnership with the MCC Foundation.</p> <p>With this in mind, the RAA is continuing to investigate how they can improve the existing facilities at the ground in order to meet the increasing demand from the local community and secure the future of rugby (and other sports and community uses) on the site. In recent years, discussions regarding potential redevelopment proposals have been undertaken with LBRuT along with meetings with local community groups and the feedback received has been positive. Accordingly, the RAA is currently in the early stages of developing a revised masterplan for the Athletic Ground involving improved facilities including enhanced sport facilities and proposals for better public access and enabling uses to fund the delivery of the proposed development. The RAA anticipates resuming pre-planning discussions with LBRuT, the Greater London Authority (GLA) and other key stakeholders in the short term.</p> <p>In the context of its redevelopment aspirations, the RAA has previously engaged in a number of LBRuT’s planning consultation exercises, including in relation to the adopted Local Plan, and more recently, consultation on the draft Planning Obligations SPD and draft Transport SPD.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>The consultation process provides a positive opportunity to continue to discuss and align the aspirations of the RAA, LBRuT and the local community in local plan making policies to assist in the delivery of improved sports facilities as well as enhanced public access to these facilities.</p> <p>We support the statement on p. 12 that the vision and new Local Plan will be written positively and the acknowledgement that the borough will need to change to accommodate future growth. Ten themes are then identified and will inform the emerging vision for growth. We are supportive of these themes as the starting point for the preparation of the vision. This includes an objective to protect and improve the borough's Heritage, Culture, Green infrastructure and open land. We think this should also recognise the requirement to make best use of resources such as existing open land (e.g. playing fields) to ensure that these can be enhanced to better meet the needs of residents.</p> <p><a href="#">See also general comments on the Vision as below.</a></p>
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	<p>1.1 The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. This submission represents the joint response from the Group.</p> <p>1.2 The Group was formed in 2012 in recognition of the particular ecological, historical and recreational importance of the Old Deer Park and has since then worked for encouraging and securing the preparation of a coherent strategy for the effective conservation, development and management of the Park. In June, 2012, the Group published its report: <i>The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement</i>. Since then, it has made a number of submissions to the Council on related issues. In this connection and importantly, the Group worked collaboratively with the Council and its consultants on the preparation of the <i>Old Deer Park Supplementary Planning Document</i> (as published in March, 2018). The Group has also worked, and continues to work, collaboratively with the Council on the planning and implementation of projects for the enhancement of the Park, including the recently completed, award-winning scheme for improvements at and adjacent to the Park Lane entrance to the Old Deer Park Car-park.</p> <p>1.3 The Old Deer Park Working Group notes that the present consultation follows the formal adoption of the <i>Richmond-upon-Thames Local Plan</i> in July, 2018, in which it is stated (at paragraph 1.1.1) that the Plan sets out the Council's policies and guidance for the developments of the Borough for the next fifteen years (i.e. until July, 2033) and identifies where the main developments will take place, and how places within the Borough will change, or be protected from change, over that period. Importantly, too, the Council has only just published (on 12<sup>th</sup> March) a notification regarding boundary adjustments to the still yet to be published <i>Polices Map</i> attached to the present <i>Local Plan</i>.</p> <p>1.4 In this connection, the Group notes the statement in Appendix 3 of the consultation document that the Council anticipates the new <i>Local Plan</i> being adopted in 2024 at which point it will supersede the existing <i>Local Plan</i> of 2018.</p> <p>1.5 The Group notes that the Council's has put forward four reasons for preparing a new <i>Local Plan</i> (<i>Local Plan Direction of Travel Consultation</i>, page 4) so soon after the adoption of the present <i>Local Plan</i>. Whilst the Group recognises the importance of the four cited reasons and that they should be reflected in adopted planning policy, it would question whether the Council having adopted a <i>Climate Emergency Strategy, 2020-2024</i> in January this year actually 'necessitates a new strategic vision for the future of the Borough and a new-place-making strategy for how this will be achieved', rather than simply building upon the existing <i>Local Plan</i> – only very recently adopted in its entirety.</p> <p>1.6 Similarly, the Group questions whether growth in population in the Borough and related matters justify the preparation of an entirely new <i>Local Plan</i> so soon after the adoption of the present <i>Plan</i>.</p> <p>1.7 Similarly too, the Group questions whether the anticipated housing target for the Borough set out in the still yet to be formally adopted draft <i>London Plan</i> of 2019 necessitates the preparation of an entirely new <i>Local Plan</i>.</p> <p>1.8 Finally, the Group seeks clarification of the significant changes which the Council alleges have been made by Central Government to planning legislation, policy and guidance since July, 2018 (and the anticipated changes), which are put forward as further justification for preparing an entirely new <i>Local Plan</i>.</p> <p>1.11 Without necessarily accepting or rejecting the factors that the Council has put forward in justifying the preparation of a wholly new <i>Local Plan</i>, the Group welcomes the opportunity of putting forward a number of issues relating to the care, conservation, development and management of the Old Deer Park for consideration in the preparation of a new <i>Local Plan</i> in response to the Council's invitation. These primarily relate to the failure of the Council and the</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>Inspector to properly or adequately consider and respond to significant and long unresolved designations relating to the Old Deer Park put forward by the Group in the consultations and submissions leading to the adoption of the <i>Richmond-upon-Thames Local Plan</i> in July, 2018 (and in the consultations leading to the adoption of the <i>Old Deer Park Supplementary Planning Document</i> in March, 2018. The preparation of a new <i>Local Plan</i> provides the opportunity to review and resolve these particular anomalies and omissions.</p>
24	Paul Velluet	<p>1.1 The comments below are submitted in an entirely independent capacity based on long familiarity with planning and development issues in the Borough and direct involvement as a Borough resident in the Council's plan-making process and in the interpretation and application of the Council's planning policies and guidance for over forty years. My professional experience as an architect - working in both private practice and the public sector specialising in building conservation and development in historic areas - has been complemented by serving in past years on the Council's former Conservation Areas Advisory Committee, by serving for four years as Chairman of The Richmond Society and fifteen years as Chair of its Conservation, Development and Planning Sub-Committee, by serving for ten years as Regional Architect and Assistant Regional Director of English Heritage, London Region, and by serving on the RIBA's Planning Group and Awards Group and on The Thames Landscape Strategy Panel of the former Royal Fine Art Commission.</p> <p>1.2 I note that the present consultation follows the formal adoption of the <i>Richmond-upon-Thames Local Plan</i> in July, 2018, in which it is stated (at paragraph 1.1.1) that the Plan sets out the Council's policies and guidance for the developments of the Borough for the next fifteen years (i.e. until July, 2033) and identifies where the main developments will take place, and how places within the Borough will change, or be protected from change, over that period. Importantly, too, the Council has only just published (on 12th March) a notification regarding boundary adjustments to the still yet to be published <i>Policies Map</i> attached to the <i>Local Plan</i>.</p> <p>1.3 In this connection, I note the statement in Appendix 3 of the consultation document that the Council anticipates the new <i>Local Plan</i> being adopted in 2024 at which point it will supersede the existing <i>Local Plan</i> of 2018.</p> <p>1.4 I note that the Council's has put forward four reasons for preparing a new <i>Local Plan</i> (<i>Local Plan Direction of Travel Consultation</i>, page 4) so soon after the adoption of the present <i>Local Plan</i>. Whilst I recognise the importance of the four cited reasons and that they should be reflected in adopted planning policy, I would question whether the Council - having only adopted a <i>Climate Emergency Strategy, 2020-2024</i> in January this year - actually 'necessitates a new strategic vision for the future of the Borough and a new-place-making strategy for how this will be achieved', rather than simply building upon the existing <i>Local Plan</i> – only very recently adopted in its entirety.</p> <p>1.5 Similarly, I would question whether growth in population in the Borough and related matters justify the preparation of an entirely new <i>Local Plan</i> so soon after the adoption of the present <i>Plan</i>.</p> <p>1.6 Similarly too, I would question whether the anticipated housing target for the Borough set out in the still yet to be formally adopted draft <i>London Plan</i> of 2019 necessitates the preparation of an entirely new <i>Local Plan</i>.</p> <p>1.7 Finally, I would value clarification of the significant changes which the Council alleges have been made by Central Government to planning legislation, policy and guidance since July, 2018 (and the anticipated changes), which are put forward as further justification for preparing an entirely new <i>Local Plan</i>.</p> <p>1.9 The posing of such questions, clearly suggests that the present Administration is open to being persuaded to set aside well tried and tested protective policies in favour of purely short-term economic and other objectives.</p> <p>1.10 Without necessarily accepting or rejecting the factors that the Council has put forward in justifying the preparation of a wholly new <i>Local Plan</i>, I welcome the opportunity of putting forward a number of issues relating to the future of Richmond Station for consideration in the preparation of a new <i>Local Plan</i> in response to the Council's invitation. These primarily relate to the failure of the Council and the Inspector to properly or adequately consider and respond to significant and long unresolved issues which I put forward in the consultations and submissions leading to the adoption of the <i>Richmond-upon-Thames Local Plan</i> in July, 2018. The preparation of a new <i>Local Plan</i> provides the opportunity to review and resolve these particular anomalies and omissions.</p> <p>1.11 However, I remain apprehensive that the stated commitment to carrying out a review of existing Green Belt, Metropolitan Open Land and Other Open Land of Townscape Importance ('to fully inform our spatial strategy and approach to growth and development in the Borough') to which reference is made on page 39 of the consultation document, and reflected in Questions 11 to 17 of the questionnaire, raises the considerable risk the potential de-designation of many, much valued open spaces of the Borough as an unintended consequence of a simplistic search for growth.</p>

Respondent reference no.	Name / Organisation	Detailed comments
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<p>1. The consultation cites four reasons for early revision to the Local Plan adopted in 2018:</p> <ol style="list-style-type: none"> <li>a. Climate Change Emergency and Air Quality Action</li> <li>b. Population Growth</li> <li>c. New London Plan</li> <li>d. Changes to National Planning Policies</li> </ol> <p>2. We do not believe the Local Plan Direction of Travel document provides sufficient evidence to demonstrate the current Local Plan is not fit for purpose today or over the next 10 years in meeting growth, social, economic and environmental objectives. It was only adopted in July, 2018, and in its entirety in March, 2020. The case has not been made that the direction of travel or the objectives themselves have changed sufficiently to warrant a new Local Plan.</p> <p>3. Circumstances and choices as to how best to meet the objectives change all the time. But we are not convinced that the recently adopted Local Plan 2018 is sufficiently deficient in dealing efficiently and effectively with the four cited topics to justify a new Local Plan. There are subsidiary tools, such as the preparation and adoption of Supplementary Planning Documents, that we believe could remedy the changing economic, social and environment challenges through the life of the existing Local Plan, whose term was predicted in only very recent years. There are ways of dealing with new legislation or new Government policy that may otherwise conflict with adopted Local Plan policies. The four cited topics are not new by any means and surely would have been anticipated when the Council was preparing the current Local Plan. We are concerned that no sooner is the proposed new Local Plan adopted in 2024 that another will then be deemed necessary and that the 15-year lifetime of such plans in reality is more like 5 years. This hardly provides stability for the implementation of planning policies and instead creates uncertainty and opportunism.</p> <p>4. Preparing a new Local Plan in order to keep up to date (the reason given for the new Local Plan) suggests that a new Local Plan could itself be out of date should the current corona virus epidemic continue for any length of time. We suggest that under the current circumstances consideration be given to the Direction of Travel process being deferred.</p> <p>5. For the avoidance of doubt we are not saying the four topics cited above are not important - they are, and we endorse the Council's concern that they be recognised in planning policy.</p> <p>6. We note that the proposed new plan focusses on growth, and we are not aware growth predictions for the Borough of Richmond-upon-Thames have changed significantly from those incorporated in the current Local Plan. The chart on page 7 of the Direction of Travel document projects the population of the borough increasing from around 202,000 in 2020 to 215,000 in 2030 or 6.4% over ten years. What is changing is awareness of the environmental issues facing us from global to local level and hence the need to focus increasingly on growth being sustainable and the possibility of limiting or even discouraging any growth. But the Direction of Travel document seems to be seeking increased flexibility to facilitate growth by loosening the constraints that the current Local Plan rightly provides to protect the environment. If anything, the Direction of Travel document seems to promote growth while putting at risk the quality of the environment. In our view the protection of the environment should be a key objective and not the poor cousin of growth and treated as one of several constraints to growth. The precautionary principle is essential under the circumstances.</p> <p>7. We refer to growth in the previous paragraph as overall growth reflected by population. But within the societal mix there are naturally some elements growing and others waning. It is important to maintain a balance. For example, in Central Richmond the mix of retail, office and residential use is an important balance that changes over time.</p> <p>8. We believe evidence is essential when formulating planning policy and we welcome the Council's references to the gathering of specific evidence that is needed. The Direction of Travel document is lite on evidence and that is not unexpected at the early stages of preparing a new Local Plan. What evidence we are aware of we do not believe supports proposals to dilute current planning policies. The absence of new evidence means we are not able to draw definitive conclusions on proposed new policies or significant revisions to existing policies and we ask that this be taken into account when considering our response.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p><b>Response to the Specific Themes in the Direction of Travel document</b></p> <p>9. Our response here focusses on the heart of Richmond but we realise the Direction of Travel document covers other areas of the Borough necessitating consideration in the preparation of a new Local Plan. We believe it is essential when considering planning for Richmond that Richmond Green and the Riverside are included in the spatial scope. Together we refer to these as Richmond comprising the Conservation Areas for Central Richmond and Richmond Green and relevant parts of the Conservation Area for the Riverside. The use, character and value of the three components of Richmond are very different but it is this diversity, side by side in a relatively small area, that is so valuable. The whole is greater than the sum of the parts.</p> <p>10. We suggest the need is to ensure Central Richmond is attractive for residents, visitors, businesses and employees. The Riverside and the Green add value directly for residents and visitors and indirectly for businesses and employees. It is essential that the different characteristics of the three areas are maintained, not only to provide Richmond with a viable future which is differentiated from other competing towns but to sustain the character, quality and historic significance of the Riverside and the Green for future generations.</p> <p>11. As we write, the corona virus epidemic is entering a severe phase - necessitating a lock-down from which some businesses will not survive and others will be materially changed. Meanwhile, the impact on retail of internet shopping continues. The way of life for residents, visitors, businesses and employees will probably change significantly over the next few years and probably over the long term. The extent of change and its direction is impossible to predict reliably at this moment. The Direction of Travel document suggests policy options. We explained in our response to the introduction why we are concerned at attempting to prepare a new Local Plan at this time. In addition, the uncertainty and shortage of evidence by which to judge the options presents a particular difficulty for us in responding to the consultation. We are concerned that under these circumstances our comments can only be tentative but that this then leaves wide open scope for interpretation by the Council that we might not share. In saying this we are not intending disrespect of the Council in any way.</p> <p>12. Given the inevitable tentative nature of our response under the current circumstances, we should make it clear that we may wish to make changes to our responses.</p> <p>13. In one way or another all the themes in the Direction of Travel document are relevant for Richmond. We discuss each of them in turn. <i>[Responses are set out in the relevant sections in this table.]</i></p>
28	Alice Shackleton on behalf of The Kew Society	<p>1. The Kew Society (“TKS”) represents some 800 residents of Kew. As an amenity society it is established for the public benefit and its objectives are to promote high standards of planning and architecture in Kew, to educate the public about the locality, to preserve and enhance the beauty of Kew and its village and to extend and preserve public amenities in the domain.</p> <p>2. The Council is setting in motion the process to create a new Local Plan, intended to be adopted in 2024.</p> <p>3. The Kew Society questions the need for a new Local Plan for the following reasons. The Council, in our view, has not yet made the case in this consultation document.</p> <p>4. The existing Local Plan was adopted only in July 2018 after extensive consultation and a public examination. This was a very detailed and rigorous process, in which the Inspector carrying out the public examination made few substantive amendments, an implied recognition of the quality in planning terms of the draft.</p> <p>5. The Local Plan must be in general conformity to the London Plan and the National Planning Policy Framework. Accordingly, it must be under constant review and is subject to alteration, just as the London Plan must conform to National Planning Policy Framework. This is a continuing process which is undertaken at local and London level. There is no requirement for a completely new Local Plan when changes in national or London planning policy, decisions of the courts or circumstances occur. Indeed, the Mayor of London’s comments on the draft London Plan process and background set this out clearly on his website. <i>Alteration</i> meets such needs.</p> <p>6. The consultation document does not, in our view, justify the creation of an entirely new Local Plan, particularly so soon after the adoption of the July 2018 Local Plan, which was to cover the next 15 years. Clearly it is envisaged by the fact that the Local Plan is intended to cover 15 years that there will be necessary alterations – not an entirely new Local Plan. The consultation document does not explain why a new Local Plan is needed for the reasons given by the Council (Climate Emergency Strategy, projected growth in population, housing targets increased by the draft London Plan – but now at a more realistic level, changes to legislation). Why can the adopted Local Plan not deal with these?</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>7. The adopted Local Plan, supplemented and supported by SPDs, Conservation Area statements, Village Character areas, is the result of rigorous policy making and a wealth of expertise and long experience. We would welcome information on what the Council considers will be dealt with in a new Local Plan that could not be accommodated in this adopted Local Plan.</p> <p>8. The Council has decided on a new “vision” to inform the new Local Plan. It says “the new vision and new Local Plan will be written positively, and it will be about what you want to see rather than what you don’t” (p.12 Local Plan Direction of Travel Consultation document). What does this mean? It is not clear what it means, certainly in planning terms. If this is intended to be a fundamental change to how the Council sees the planning policy, then is this a direction of travel we would want to take?</p> <p>9. The adopted Local Plan (as all such plans) deals with protection as well as positive planning aspects of development as It must do if only to conform to strategic matters in national and London planning policy. It is not (or should not be) a question of <i>either</i> protection <i>or</i> something “you want”. Planning policy includes all aspects.</p> <p>10. The Council’s questionnaire contains questions that raise alarming possibilities : could “what you want” mean current important matters (such as shortage of affordable housing) be used to override designation of protected open lands ? These lands should, in our view, be held by the present owners as trustees for future generations. Once gone for current short-term needs and perceived needs, they are gone forever.</p> <p>11. How does this new “vision” relate to the Climate Emergency Strategy in planning terms, in ways that the adopted Local Plan does not? Again, “what you want” could well translate into something that destroys not only long evolved and tested planning policy and practice but also some protected open space which should be held for future persons.</p>
29	Richmond Cycling Campaign	<p>This is the group response from Richmond Cycling Campaign, the local branch of London Cycling Campaign, and it has been arrived at with feedback from members locally as well as from LCC head office.</p> <p>Summary In overall summary, we welcome both this consultation and this new plan. The increased focus on supporting non-car travel modes is welcome, as is the focus on wider sustainability issues.</p> <p>However, our general ‘ask’ is that these provisions are significantly strengthened in this and later revisions: if this is a plan to be used as a baseline for the next 10-20 years, it must start from the assumption that the private car should not be designed into our borough as the right way to move around, whether it is electric or not. Rather, we should ensure that the borough emerges from this exercise with a clear, robust plan to make sure that every person, everywhere in the borough, can honestly and safely make transport decisions which are low- or no-carbon, and which feel and are safe. Every time we mention or look at transport, new developments, visitors, etc., we should ask “how can people get there without a car?”</p> <p>We ask this not purely because of our general interest in walking and cycling, but because taking this approach supports a range of other crucial policy imperatives, including keeping people active, reducing borough carbon emissions, prioritisation of public transport, and maximising space available for people.</p> <p>P9: ‘what should the borough look like in 15-20 years’ time? In the next 20 years the borough should be a place where roads look people friendly rather than like car parks as people drive cars for exceptional journeys, if at all. A place where people move to and think “I don’t need a car”. A place where air quality in our town centres and schools is as good as the air in our parks. A place where children actively choose to cycle to school from year 4 or 5 in primary. A place where businesses and local Government have worked together to make our borough a beacon of community, supported by removing the barriers that many main roads form. A place where deliveries are by cargo bike or other emissions-free methods, and are consolidated and organised to maximise efficiency.</p> <p>P13: “What do you think? What challenges do we face? The key challenge that is faced in anything to do with transport is the utter dependence that many people feel they have on their cars. Our challenge will be creating a culture of walking and cycling for normal trips in the face of determined opposition that does not recognise the unfair dependence on car culture and how it dominates our entire streetscape.</p>
30	Jon Rowles on behalf of Friends of Heathfield	<p>The explanation of what a local plan is not clearly explained. We feel there is a better explanation here <a href="https://www.gov.uk/guidance/local-plans">https://www.gov.uk/guidance/local-plans</a> “Local plans are prepared by the Local Planning Authority (LPA), usually the Council or the national park authority for the area.</p>

Respondent reference no.	Name / Organisation	Detailed comments
	Recreation Ground and Environs	<i>The National Planning Policy Framework (NPPF) states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area and a framework for addressing housing needs and other economic, social and environmental priorities.</i> The workforce population chart; there needs to be an exploration of the Slough and Heathrow Travel to Work Area - as this is the cause of a great amount of congestion and pollution in our borough.
40	Jamie Edwards	I don't believe the so called 'Climate Emergency' is a topic Richmond should prioritise. The UK has the best green credentials in Europe and the UK only contributes 1% of Global Co2 emissions. There are other priorities in the Borough more important. School Funding. The roads are full of potholes and there is overpopulation, with no clear strategy about providing more GP appointments or infrastructure.
42	Jeremy Gill	It seems your chief aim is to point up at every opportunity how wrong the government are about just about everything and how useless they are to anyone but the people they care about, their business associates. We do know that and we don't need you to keep reminding us, we're not stupid. Nor do we need you to keep pursuing policies designed to show how environmentally aware you are. In my opinion your slavish devotion to setting grand targets and keeping to them to the detriment of other areas of responsibility is a waste of scant resources and robs the people of this borough of a local authority capable of thinking on its feet. When public opinion on these issues reaches a tipping point whatever government of the day will suddenly develop a desire to create policy capable of satisfying this change. You frittering away money and energy by attempting to tackle these issues in relative isolation.
44	Roger Cutler	Ensure that, in planning for growth, it is essential that you do not remove any parking facilities - particularly Twickenham Embankment. You will kill off local shops, pubs, clubs & restaurants in the centre of Twickenham who depend on the ability of their customers to park nearby. Otherwise shoppers will just go elsewhere. The killer of any high street is high council tax & lack of parking spaces.
45	Sally Beeson	I very much appreciate the Council's plans for a sustainable and green Borough and the pressures on it to build on every square inch, but I feel very strongly that local residents' views always seem to be regarded as not important, when a decision made from a non elected official who isn't local, takes precedence. Decisions taken locally by local people ought to outweigh any others, which is why I think local voters feel that their voices aren't heard anyway, so think well, why bother.
49	Margaret Edwards	It makes sense to have this plan
50	John O'Brien	It does not mention how we will reduce the level of traffic gridlock which is experienced every working day. This has been exacerbated by the closure to traffic of Hammersmith Bridge. There are at least a dozen traffic grid lock black spots in the borough and nothing is being done to deal with them.
51	Su Bonfanti	I support the need to revise the Local Plan to respond to policy changes and I especially support the intention to set stretching standards and targets that will push developers big and small not to settle for 'just good enough'. You need to do this now or it will be too late to tackle climate change, pollution and the piecemeal degradation of the built environment.
52	Winston W Taylor	It raises enough questions on its own . I dont have time to give detailed replies to the questions. It would take several thousand words. One initial comment on the document as a whole. Air quality is not mentioned in the list of issues until issue 10. I recognise that it appears in some of the discussions on other issues but I dont think it is given the prominence it deserves.
53	Richard Woolf on behalf of McDaniel Woolf Architects	I'm strongly in favour of your focus on population growth, which drives all other factors governing our built environment.
54	Paul Luton	Clearly if the council has declared a climate emergency dealing with carbon footprint is the main issue.
55	Jon Rowles	"The borough is prosperous, safe and healthy" This is incorrect -in many areas there is relative deprivation, which a marked variance in health outcomes. The council stating this 'rose-tinted view' makes it much harder for local groups to obtain grants to address the very real needs in some communities like Ham, Heathfield and Hampton North.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Thank you for consulting the Royal Borough of Kingston upon Thames on The London Borough of Richmond Upon Thames Local Plan Direction of Travel Consultation and giving it the opportunity to comment on it. The text explaining what a Local Plan is and why Richmond Borough Council wants to hear from its residents, businesses, stakeholders is drafted in a positive user-friendly way, and this would encourage consultees to respond to the consultation questions.
63	Carol Rawlings	It doesn't say anything specific. Too generalised. Questions and comments should come after reading the local plan. However, I can't find the local plan! A clear link is needed.

Respondent reference no.	Name / Organisation	Detailed comments
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	<p>We support the need to revise the Local Plan to respond to policy changes and especially to set stretching standards and targets that will push developers big and small not to settle for 'just good enough'.</p> <ul style="list-style-type: none"> <li>· However given the implementation date for this new Local Plan is planned for 2024, we feel it contradicts the emergency aspect of Climate Change and therefore cannot be a substitute for emergency action (ie over the next 18 months) that is critical in the borough. There needs to be new, significant policies in place before 2024.</li> <li>· Also, since "The Government is constantly changing planning policy, guidance and legislation" we need a plan that can be flexible enough to accommodate these changes as they appear without the need to rewrite everything again from scratch which is not a good use of the borough's resources. The base of a Local Plan should be strategic and include a 10 yr view of what the borough should be aiming for (regardless changes in political party managing the borough!) with only specific parts of this plan evolving as trends and legislation evolves (e.g. protecting conservation areas and improving high streets won't change, we need to concentrate on the parts of the plan that do require updating).</li> <li>· We support the council's aim to share this plan with the community for feedback. However, if the council genuinely wishes to have representative and meaningful feedback from the Community it needs to reconsider how the document is written as it is not at all accessible in its current form (way too long for anyone to read, doesn't concentrate on the key points and main changes enough, etc.). It is not the right format to share with the community at all and we have therefore found that the interest to respond to this consultation was very low.</li> </ul>
66	Robert Philip Cunliffe	Good, clear and well written
67	William Mortimer	The document raises the issue of climate change but nowhere explains what is being done about Disaster Management. I have raised this point before especially as flooding is a major risk (witness the wretched plight of the Midlands and North this year). I have sent you before a summary of the action I believe to be necessary and included therein are the physical entities needed in the SW13 area to enable the community to be protected.
68 (a)	Mark Jopling	Will need to change to reflect the long term impact of CV-19
68 (b)	Mark Jopling	Will need to reflect changes as a result on CV-19
<b>Does this document raise any specific equality impacts which would affect particular groups or communities of people in Richmond?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>Parking Standards; the number of parking spaces at new developments could impact certain protected groups without careful management. Certain groups are less likely to drive – and developments with poor public transport accessibility can have a negative impact on their quality of life. We suggest that communities on the west of the borough are more likely to be commuting to work in the Slough &amp; Heathrow TTWA than those in the east. Is there a need for better public transport to these areas? Should the proposed West London Orbital Railway be extended to Twickenham?</p>
31	Tim Catchpole on behalf of Mortlake with East Sheen Society (MESS)	No
39	Solomon Green	No
40	Jamie Edwards	Focusing on Climate change as a Top priority, detracts resources from other more essential areas that need huge improvement. Like the state of our roads. Empty shops. Litter. Crime etc.
41	Anthony Swan	Intro says "stakeholders". Unless these are identified thane cannot know if any area is being excluded. Maybe this level of detail comes later.
42	Jeremy Gill	Yes, anyone who understands scientific issues. Also anyone suffering from any of the serious environmental issues specific to the borough, such as the rising tide of anti-social behaviour in less affluent parts of the borough which the council are unwilling to acknowledge as they do not involve prestigious infrastructure projects.
43	Paul Hart Prieto	none
44	Roger Cutler	Car drivers & pedestrians are disadvantaged while cyclists benefit above everyone else. There is a lack of equality in road & pavement use.
54	Sally Beeson	<p>I think that the young and old have specific needs and should be given priority. Protecting our air quality - reducing pollution by over building and protecting our important green spaces, cultural centres and beautiful buildings, are vital for the health and well being of us all. Our Borough is stunning, let's keep it that way.</p>

Respondent reference no.	Name / Organisation	Detailed comments
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Reliance on cars and vehicles adversely affects less wealthy and socially excluded groups, and causes lack of social cohesion
49	Margaret Edwards	Currently the needs of older people are probably underrepresented for example in relation to housing needs
52	Winston W Taylor	Yes. The traveller community is mentioned. And they need to be considered as indicated in the Housing section.
53	Richard Woolf on behalf of McDaniel Woolf Architects	No. The introduction is fair and reasonable.
55	Jon Rowles	Many disadvantaged groups (BAME, Disabled) have fewer employment opportunities - and mean they are less likely to get jobs in central London which they can access by public transport. The parking restrictions proposed are likely to reduce their employment opportunities more than groups who don't have the disadvantage. A Large number of people in the west of the borough work in the Slough & Heathrow TTWA - and the council should drill down these TTWA statistics more.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	It would be helpful if it is made clear that this document is available in other formats to help people with impaired sight or whose mother tongue is not English Language to give them confidence that the invitation to comment on the consultation document is inclusive.
63	Carol Rawlings	Cannot comment until I have read the local plan in its entirety.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	The increasing numbers of older people makes it essential that the built environment is adapted to frail and disabled people. Meeting their needs is likely to make eg the public space more user-friendly for a range of users, eg people with buggies.
66	Robert Philip Cunliffe	No
67	William Mortimer	In particular you ask for strategic sites to be identified. I have been very disappointed in consultation about the Mortlake Brewery site that the Council has failed to understand the issues of ramming so many dwellings and a major school project into an area where movement is constrained between river and railway. If you are serious about getting people to use more public transport why have suggestions of an extended catamaran service using the historic Thames highway been ignored?
<b>Scale of the challenge, opportunities and setting the Direction of Travel</b>		
<b>What challenges do you think Richmond borough faces now and in the future?</b>		
29	Richmond Cycling Campaign	<p>We think the rising population in the borough will add pressure to a wide range of services. Specifically we are concerned that if the borough fails to immediately design and build sustainable transport options, we will live in an area blighted by even more congestion, along with the resulting risks of pollution, road danger, severance and inactivity.</p> <p>See also comments in section on Introduction (included below to assist reviewer)  <i>P13: "What do you think? What challenges do we face?"</i>  <i>The key challenge that is faced in anything to do with transport is the utter dependence that many people feel they have on their cars. Our challenge will be creating a culture of walking and cycling for normal trips in the face of determined opposition that does not recognise the unfair dependence on car culture and how it dominates our entire streetscape.</i></p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<ol style="list-style-type: none"> <li>(1) building quality new homes to meet the population growth</li> <li>(2) Ensuring the new development is sustainable and the principle of proximity is fully embedded into plan making</li> <li>(3) increasing local infrastructure to meet the needs of the additional population</li> <li>(4) addressing poor local air quality</li> <li>(5) ensuring that we don't add to the global environmental problems</li> <li>(6) Ensuring that the borough does not just work for the wealthy, and that we provide more routes out of poverty, and enable people to advance and build a secure future for themselves and their families.</li> </ol>

Respondent reference no.	Name / Organisation	Detailed comments
28	Alice Shackleton on behalf of The Kew Society	The challenge of accommodating protection of protected open lands and heritage assets with satisfying perceived strategic needs relating to climate change, environmental protections, housing need and population and protection of business and facilitating new forms of business activity (with re-examination of high street).
31	Tim Catchpole on behalf of MESS	In addition to the challenges mentioned there are the issues of how best to provide more affordable housing and how best to cater for orbital traffic.
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	<ul style="list-style-type: none"> <li>• Achieving local and national climate change targets and decarbonising streets<sup>2</sup></li> <li>• Addressing declining / changing town centres and neighbourhood centres</li> <li>• Achieving housing targets with high-quality, contextual, well designed and affordable development</li> <li>• Achieving 'Vision Zero' road safety targets.</li> </ul> <p>Reference  <sup>2</sup> Department of Transport, UK Government (2020) Available at: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/867242/decarbonising-transport-setting-the-challenge.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/867242/decarbonising-transport-setting-the-challenge.pdf</a> (Accessed: 29 March 2020).</p>
39	Solomon Green	Business rates are too high and have driven out many small businesses. This trend has been aggravated by the concessions enjoyed by charity shops. It is noticeable that a number of these now buy in and sell new goods as well as donated items. Consequently as well as enjoying favorable rates and using volunteer shop assistants they compete directly with small shopkeepers, helping to drive more out of business. Hence the detrimental increase in fast food outlets, nail bars, hair dressers, tanning salons and empty shops in the borough.
40	Jamie Edwards	Infrastructure to support existing Council Tax payers. Not focusing on so called 'Climate Emergenies'. Improving the quality of existing infrastructure for existing residents should be the number 1 priority. Roads are too busy - Not because of cars per se, but over population and building hundreds of new homes, for example Twickenham station. With no parking spots for new residents who will flood already surrounding very busy residential streets.
41	Anthony Swan	Supporting older people. Sheltered accommodation as proposed in the Udney park site would be welcomed - along with modern doctors surgery. Sports facilities in Udney Park very important to local clubs. Recycling being done and organised clearly. High street is changing. Encourage low cost premises for pop up shops and micro businesses. Local schools to engage more with the business world so that students end up with the skills businesses need. More and protected cycle lanes. Share some pavements if necessary. The Borough is very full as regards housing. Council talk about low cost workers accommodation but little actually seems to happen . Support for cross rail so local access can be sure and speedy to central London. Boris is likely to stop Heathrow expansion because the country cannot afford that and High speed rail. Demand for electric cars must be supported by charging points. Clubs and things for Youth to do in evenings must be supported. Raise Policing to stop county lines, drugs and weapons on the streets. Open Kingston police station again. Too many dangerous blue lights heading from Twickenham/Teddington. Use convicted offenders in a useful way to improve environment, plant trees. Stop Thames Water polluting eg River Crane. Encourage new Twickenham Riverside to work well. More electric buses - or even hydrogen. Support high speed internet coms green boxes Road works. Bang heads so Thames Water does communicate with Electric and Gas to minimise hole digging. ... and lots more
42	Jeremy Gill	A serious rise in the use of class A drugs and the truly damaging effect this is having on communities.
44	Roger Cutler	Rough sleepers. Excess wastage of money by the council. Therewas a perfectly good plan in place for the development of Twickenham Embankment & it has been thrown out & the money wasted. Shortage of money put into medical & social care. Money wasted on cycle lanes/routes when most cyclists just cycle on the

Respondent reference no.	Name / Organisation	Detailed comments
		pavement endangering pedestrians. Lack of parking in the Borough causes more pollution as people drive in search & idle.
54	Sally Beeson	Pressure to build on every small spare piece of land, which brings more cars, creates pollution, noise, overcrowding of schools, doctors surgeries and amenities generally - a burden on our already congested area. The threat of a third runway still hangs over us all.
47	Trevor Rowntree	Over population. I think the issues we are facing are mostly caused by over population. There are too many people in this borough and not enough facilities.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Stopping reliance on cars and vehicles that is causing air pollution that's killing around 9,000 a year across London, helping cause climate change that will flood London, causing ill health through lack of exercise, and causing lack social of social cohesion.
49	Margaret Edwards	Congestion and pollution caused by car usage, climate change causing floods and droughts, government wish to make local authorities totally self financing, ageing of the population and shortage of people to provide services in health, care, hospitality and trades such as building, especially after Brexit and in light of high housing costs.
50	John O'Brien	More active policing of petty crime - car theft, burglary, fly tipping. Reducing the need to travel is OK but you have to address the terrible problems of traffic grid lock by proving critical junctions (e.g Upper Richmond Road turn left to A205 - change traffic light settings; Mill hill road junction with Rocks lane - widen road by 2 feet to allow 2 lanes) AND the 20 mph speed limit on Kew Road is pure folly.
51	Su Bonfanti	How to remain somewhere a range of people can live and work, not just a rich white person's dormitory.
52	Winston W Taylor	Climate change Affordable housing Air Quality Changing behaviours over cars Maintaining Green spaces Supporting High Streets
53	Richard Woolf on behalf of McDaniel Woolf Architects	Development densities, housing specifically. Management and conservation of woodland and open spaces. Switch to the electric economy and sustainable transport.
55	Jon Rowles	- The poor financial settlement from the Government which means Richmond residents are subsidising other local authorities. - Opportunities for employment are decreasing due to loss of office space. - Pressure on industrial space - as the Heathrow supply chain can outbid local firms - Poor air quality from aviation - both directly from aircraft and road traffic generated by the airport. - Firms relocating the Slough and Heathrow Travel to Work Area to 'beat' the Mayor of London's curbs on car parking and congestion charging means that many jobs are now located in areas with poor public transport - Recovering from the Corona pandemic - we could see many shops not reopening. - There is a lack of street markets in many towns due to opposition from traders and the imposition of rules where a market stall isn't allowed to compete with an existing shop. This makes it more difficult for people to start up a business.
56	Rob Kennedy, Environment Agency	There are challenges around housing, climate change and car parking and car usage in the borough.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	The key challenges which the London Borough of Richmond Upon Thames faces now and in the future are well articulated and clearly set out on pages 8, 9, 10, 11, and 12 of the consultation document.
62	Kathleen Massey	Protecting the special heritage of Richmond is key whilst there appears to be pressure on the council to build additional homes. It is important that areas of historic interest are not spoilt by inappropriate building eg around the historic houses and buildings of Petersham and Ham Common which need to be protected and

Respondent reference no.	Name / Organisation	Detailed comments
		<p>preserved.</p> <p>Ham is restricted by being based around a single busy road between Richmond and Kingston. Traffic issues need to be carefully considered to avoid gridlock in rush hour and delays for buses when Richmond park is closed. The rapid increase in commuter parking in recent years has added to the problem causing further traffic issues around Ham Common and in residential roads with increased weaving in and out of parked vehicles causing risks for pedestrians and problems for delivery vans, lorries and larger vehicles.</p>
63	Carol Rawlings	Traffic problems throughout the borough and especially between Kingston and Richmond. Driving through the park is bad for wildlife; along the Richmond Road through Petersham is impossible when the park is closed and produces high levels of pollution. Unless private vehicles are restricted (e.g. to local residents) or banned, it is difficult to see how to improve this. Perhaps encourage bus travel with free passes for residents?
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	<p>We support the vision for the borough, in particular maintaining it as somewhere people can live and work, not just a wealthy dormitory. We acknowledge the need to accommodate the necessary growth in housing and employment infrastructure.</p> <p>While a borough-wide plan is important, the diversity of the borough must be recognised.</p> <p>Local communities put significant effort into responding to the previous administration's development of Village Plans. Rather than being ignored, the concept of hyper-local plans -and specific Village Plans where they remain useful - should be used and built upon, either in their current form or re-badged if needed to achieve political acceptability.</p>
66	Robert Philip Cunliffe	COVID-19 This poses immediate and clear challenges to the current Population Forecasting, most especially the age range forecasting. At best they are out of date, at worst they are wildly inaccurate. There needs to be a plan in place to assess and propose an alternative structure of the graphs. This is important as it underpins many of the assumptions driving the decisions and the expenditure. It may even suggest that a "pause" and a rethink / replan in a years time may be far more useful, far more targetted correctly, and far more likely to be affordable.
67	William Mortimer	<p>Top of my list is to preserve the character of the historic areas in the Borough. The one-size-fits-all approach from the Mayor of London in terms of housing density and proportion of 'Affordable Housing' to date is disgraceful. A few Councillors are reported to have visited the Mortlake area on a Saturday morning to assess traffic conditions pertaining to the Brewery site for themselves. How wrong they were to assume this time is typical of traffic flows in the working week. A study funded by Love Mortlake was not even taken into account at the public hearing. Councillors need to remember that their purpose is to serve the public and to give due importance to the alternative plan for the Brewery site submitted by Love Mortlake. It shows the Council's estimation of demand for a secondary school for 1200 pupils is inaccurate.</p> <p>I think it fair to conclude that the high-handed expectations of the London Mayor and the Council's determination to go ahead with Developer's plans for Mortlake Brewery, ignoring both actual traffic load and genuine senior schooling requirements, to be a travesty of justice for local people. Based on the judgement exhibited on this very important planning activity how can the ordinary citizen have confidence in the quality of the Local Plan?</p>
68 (a)	Mark Jopling	I support that climate change, biodiversity and green space features so strongly. There must be a really strong Plan that makes investing on urban green space not just "highly speculative" (ie) unlikely to succeed but worth the risk, rather the Council should take a firm stance on using all devices possible to divert developers to where the Plan supports development.
68 (b)	Mark Jopling	Protect all green space and encourage appropriate development on brown-field and change of use
69	Geoff Bond on behalf of Ham and Petersham Association	How do we make sure key elements of the borough that make it special are not lost for ever. Key here are two things; the small pockets of green space that provide key parts of green corridors and local sites of nature importance, secondly, the conservation areas and their unique characters need to be carefully protected. Lose either of the these two things and the area will change for the worse for ever.
70	Melissa Compton-Edwards	<p>Climate Emergency (including flooding risks, heatwaves and water shortages);</p> <p>Population growth, leading to pressure to build on greenbelt land to meet housing targets, increased traffic congestion and resulting greenhouse gas emissions and air pollution;</p> <p>Collapse of high-street outlets due to economic crises, cost of living purse-tightening by households, and online shopping trend;</p> <p>Possibility of reoccurring and new pandemics;</p> <p>Cost of supporting an ageing population and staff shortages in social care provision etc;</p> <p>Council budgetary constraints;</p>

Respondent reference no.	Name / Organisation	Detailed comments
		Challenge of persuading residents to make the behaviour changes that will be necessary to tackle the Climate Emergency and air pollution public health crisis. As the Richmond Cycling Campaign notes: "The key challenge that is faced in anything to do with transport is the utter dependence that many people feel they have on their cars. Our challenge will be creating a culture of walking and cycling for normal trips in the face of determined opposition that does not recognise the unfair dependence on car culture and how it dominates our entire streetscape."
<b>How might our role in London change in the future?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Over the past twenty years we have moved from being very suburban area to one that is becoming more urban and this change is likely to continue. We used to be on the fringe of London, but effectively the boundary of what is functionally 'London' has moved to the M25 (if not beyond). This means that we have a dense urban belt, who's inhabitants have to travel through our borough if they work in central London.
31	Tim Catchpole on behalf of MESS	Hopefully it might not change.
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	By leading to address the challenges above with visionary, evidence based policies and implementation. Combining effective leadership with a non-confrontational, evidence led consultation process, to agree ways to achieve the necessary changes. The process fully represents residents including the quiet voices and hard to reach groups such as children.
39	Solomon Green	Hopefully not at all since the borough is one of the great lungs of the capital and a huge magnet for visitors.
40	Jamie Edwards	Stop worrying about virtue signalling projects (which seems to be a Group think phenomenon across Boroughs)... and focus on the basics.
41	Anthony Swan	Our role has been described as a green lung of London. In the future continue and improve on this. Encourage NPL and start up businesses. Encourage the schools especially at A level. Encourage St Marys ie Surrey Uni.
42	Jeremy Gill	We don't seem terribly relevant to the rest of London - because we aren't.
44	Roger Cutler	Likely to become less & less important.
54	Sally Beeson	I think you will have mounting pressure to build cheaper, smaller flats/houses and our precious green spaces may come under huge pressure to be built upon.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Be a role model for other Boroughs and the GLA
49	Margaret Edwards	Not clear to me but perhaps action across London on key infrastructure, for example coordinated approach to repair of Hammersmith Bridge, challenging rail operators who provide substandard services, cross London plans to reduce homelessness and rough sleeping in combination with services related to drugs/alcohol.
50	John O'Brien	In danger of becoming a no go area for young families and poorer people.
51	Su Bonfanti	As working from/at home becomes more realistic for more people, Richmond could become a place where even more SMEs flourish.
52	Winston W Taylor	The current Mayor's abortive reelection campaign stressed Housing and rent control as his main issues. The Mayor does not yet have the power to impose rent controls but the Council will need to plan for it in case the Government give him the power. We may need to adjust Housing targets - if Mayor Khan is reelected. Otherwise, react to new Mayor's priorities.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Richmond has the historic role as mediator between inner and greater London. It is fortunate, through historic legacy, in possessing some of the greatest open spaces and Arcadian Landscapes in the Capital. This role will change, more accessibility and management of these spaces is crucial.
55	Jon Rowles	- We will be less on the fringe of London due to a large amount of housebuilding taking place in the home counties just outside the formal administrative boundary of London - There is a danger we will become a dormitory town due to the accelerating loss of office space
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Given the Council's declaration of a climate emergency and its commitment to taking robust action to tackle the local and global threat of climate change, the role of the borough in the future in London would change in both the approaches and actions it takes to minimise the borough's environmental impact, in terms of cutting carbon emissions, waste and pollution. This would necessitate adoption of a new strategic vision for the future of the borough as well as a new place making strategy

Respondent reference no.	Name / Organisation	Detailed comments
		for how to achieve this. The Council would have to set out clear and stringent environmental planning policy in its Local Plan which new developments will be required to meet.
62	Kathleen Massey	Richmond is a centre for 'open air' tourism, with Richmond Park and the popular areas of Richmond riverside. The open areas must continue to be well maintained to remain attractive to visitors. Public transport links need to be frequent and reliable. We are seeing a decline of the retail businesses in Richmond to our detriment. New retail outlets in Richmond's centre need to be encouraged to ensure its popularity as a shopping centre continues.
63	Carol Rawlings	Without major changes, Richmond will continue to attract the wealthiest people and make housing for middle and lower income bracket workers even more difficult. We should expand social housing to address this and we could implement new low emissions and private vehicle restrictions which would lower our carbon footprint.
67	William Mortimer	Our area is blessed with green space and provides a lung for the city as well as recreational activity. The presence of trees is calming and so they are also a resource to ease the fears of older residence as they feel more and more overtaken by the march of technology. Preserving our recreational areas is vital. I have yet to see any information about the plan to recover from disaster scenarios and both the experience of flooding in the Midlands this winter and the reliance on local people to respond to needs of the elderly and infirm resulting from Covid-19 lock down needs to be formalized - and extended as necessary - for future catastrophic situations where the standard provisions of all public services (not just the NHS) are overwhelmed.
68 (a)	Mark Jopling	How can Richmond, home of Sir David Attenborough, become a world leader in ecological standards, biodiversity protection and innovation?
68 (b)	Mark Jopling	Richmond should lead the new economy - ecology and ecology-technology hub for London
69	Geoff Bond on behalf of Ham and Petersham Association	We need to perform a key role as a green area with a lower level of emissions and more green space.
70	Melissa Compton-Edwards	Depends very much on the Government's approach in terms of how future national legislation affects the responsibilities of London Councils and also which Mayor is elected in 2021. I'd like to see a more joined-up approach to planning across London's Councils. We desperately need safe protected, connected pedestrian and cycle routes throughout London, Clean Air Zones which include @TfL-controlled roads and London-wide mandatory car-free/car-lite new developments, regardless of PTAL rating. If a site is too polluted to be safe for a new development and/or the PTAL rating is too low, then air pollution reduction and/or improved sustainable transport provision should be required before the development is permitted to go ahead. The guiding principle the Council should apply to all developments, whether retail, a visitor attraction, a school or a new housing development, should be "is this easily reachable without a car?". As Secretary of State for Transport, Grant Shapps, has acknowledged in the foreword to the DfT's Decarbonising Transport consultation on developing a plan for a net zero transport system, "public transport and active travel will be the natural first choice for our daily activities" and that "we will use our cars less and be able to rely on a convenient, cost-effective and coherent public transport network". We also need to be able to travel safely and easily by walking and cycling and planning policy must enable this.
<b>What do you think should be our priorities in the new vision?</b>		
19	DP9 Ltd on behalf of London Square Developments	<b>How do we develop a new vision for the new Local Plan? – p. 12</b> We support the focus of development on brownfield sites as well as consideration of additional means to accommodate growth beyond existing approaches. It is our consideration that the existing approach to protection of employment land will not allow Richmond to meet its increasing housing delivery targets. Brownfield employment land that is unviable for continued use, including the subject Site, should be considered for this purpose.
20	Gary Backler, Friends of the River Crane Environment.	This response to the London Borough of Richmond upon Thames Local Plan Direction of Travel consultation has been prepared by Friends of the River Crane Environment. FORCE is a registered charity, set up in 2003 and with over 600 members, most of whom reside in LBRuT. More information on FORCE can be found at <a href="http://www.force.org.uk">www.force.org.uk</a>  The Objects of the Charity are to protect and enhance the corridors of the River Crane and Duke of Northumberland's River for the benefit of wildlife and local people. This response is prepared in relation to these Objects. FORCE will continue to engage with LB Richmond in the development of this important policy document and we anticipate that our views and opinions will evolve as we see more details and discuss these with the appropriate officers.

Respondent reference no.	Name / Organisation	Detailed comments
		Overall, FORCE is concerned that, even though one of the principal drivers for this consultation is the fact that LBRuT has adopted a Climate Emergency Strategy, the emphasis of the Direction of Travel is very much on construction and development in the borough. The document repeatedly emphasises the “needs to accommodate future growth” and “there is not an option to do nothing” (p9, p12). The Plan puts much less emphasis on the need to improve investment, management and operation of the borough’s green assets, and on investment in pedestrian/cycleways to divert and reduce road traffic to mitigate the climate emergency. This is despite the explicit recognition that the borough provides “a green lung for southwest London” (p9). This fundamental imbalance in emphasis needs to be redressed in the new Local Plan.
22	Jimmy Wallace, Richmond Athletic Association	<p>The vision will also be based on an objective to reduce the need to travel and improve the choices for more sustainable travel whilst also including the objective to deliver the new homes the borough needs. We think the vision should firmly outline that the most appropriate locations for new homes are both within and adjoining the existing main town centres such as Richmond and this will ensure that the best use can be made of sustainable forms of transport for new homes. The vision and spatial strategy should be clear that new housing should be targeted towards existing brownfield and underutilised sites that are either within or in close proximity to the designated town centres and public transport. This should include land either within or adjacent to existing built up residential areas where infrastructure such as good road access already exists.</p> <p>It should also be made clear that this could include opportunities to provide for infill residential development where opportunities arise close to existing residential concentrations where essential infrastructure such as good access may already exist. In particular, we suggest that Richmond town centre and its surrounding residential hinterland is an appropriate location for further infill development and limited intensification / extension of existing established residential areas.</p> <p>Whilst the broad spatial strategy of protecting green and open spaces from inappropriate development is recognised, and as we will elaborate upon further later in this letter, we believe there are opportunities at certain locations for land currently designated as green and open land to be better utilised to meet the borough’s specific growth needs and that this can be achieved without causing any harm or detrimental impact upon the availability of meaningful green and open spaces.</p>
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	<p>1.9 The Group would very much appreciate detailed clarification of the specifically planning grounds for the Council’s decision to prepare a new <i>Vision</i> and an entirely new <i>Local Plan</i>. Given the simplistic statement that ‘the new vision and new <i>Local Plan</i> will be written positively, and it (sic) will be about what you want to see rather than what you don’t’ (<i>Local Plan Direction of Travel Consultation</i>, page 12), the Group fears that such an approach might well lead to the unintended consequence of unravelling many existing and entirely sound planning policies and designations which have taken years to evolve. This risk is explicitly reflected in two of the questions posed on page 13 of the consultation document and at Questions 12 and 15 in the questionnaire:</p> <p>‘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?’ And</p> <p>‘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)?’</p> <p>1.10 The posing of such questions, clearly suggests that the present Administration is open to being persuaded to set aside well tried and tested protective policies in favour of purely short-term economic and other objectives.</p>
24	Paul Velluet	<p>I would very much appreciate detailed clarification of the specifically planning grounds for the Council’s decision to prepare a new <i>Vision</i> and <i>Local Plan</i>. Given the simplistic statement that ‘the new vision and new <i>Local Plan</i> will be written positively, and it (sic) will be about what you want to see rather than what you don’t’ (<i>Local Plan Direction of Travel Consultation</i>, page 12), I fear that such an approach might well lead to the unintended consequence of unravelling many existing and entirely sound planning policies and designations which have taken years to evolve. This risk is explicitly reflected in two of the questions posed on page 13 of the consultation document and at Questions 12 and 15 in the questionnaire.</p> <p>‘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?’ And</p> <p>‘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)?’</p>
25	Phoebe Quayle	<a href="#">See comments on the vision as below.</a>

Respondent reference no.	Name / Organisation	Detailed comments
29	Richmond Cycling Campaign	We believe the council should focus on sustainability, and the embedding of its new transport hierarchy in all its work. As part of London, the borough should also focus on how delivering sustainable transport options requires partnership with other authorities. (The recent Liveable Neighbourhoods bid with Kingston is a good example of this.)
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The Government wants LPAs to address; housing needs, economic, social and environmental priorities.” We feel you should follow this framework.
31	Tim Catchpole on behalf of MESS	Action v climate change and the provision of more affordable housing.
32	Mark Jopling on behalf of UPPFT	Overall the Trust welcomes the "Direction of Travel" consultation document, which gives such high priority to climate change and green infrastructure. Richmond, as a green and affluent Borough, has responsibility to be one of the leading Boroughs for the new sustainable economy, accelerated by the aftermath of CV-19, that will emerge in this new decade. As the home of Sir David Attenborough, the most influential ecologist of this Century, Richmond should be a global leader in building a sustainable community that protects biodiversity and green space. ..... Richmond can lead London, the worlds first National Park City. Be bold.
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	<ul style="list-style-type: none"> <li>• Meeting climate change targets, and decarbonising streets (transport is the highest source of carbon emissions at 27%<sup>3</sup>).</li> <li>• Creating successful, attractive and vibrant, people and family friendly town centres and neighbourhood centres and cohesive, inclusive self-sustainable communities (20 minute neighbourhoods <sup>4</sup> &amp; <sup>5</sup>)</li> <li>• Implementing 'Good Growth by Design'<sup>6</sup> development and protecting heritage and green spaces.</li> <li>• Implementing changes through policy, design, education, procurement and enforcement to achieve Vision Zero to make the borough attractive and safe for sustainable and active travelling.</li> </ul> <p>References:  <sup>3</sup> London Borough of Richmond upon Thames Climate Change and Sustainability Strategy (2019) Available at: <a href="https://www.richmond.gov.uk/media/17648/climate_change_and_sustainability_strategy_2019_2024.pdf">https://www.richmond.gov.uk/media/17648/climate_change_and_sustainability_strategy_2019_2024.pdf</a> (Accessed: 29 March 2020).  <sup>4</sup> Victoria State Government (2020) 20-minute neighbourhoods. Available at: <a href="https://www.planning.vic.gov.au/policy-and-strategy/planning-for-melbourne/plan-melbourne/20-minute-neighbourhoods">https://www.planning.vic.gov.au/policy-and-strategy/planning-for-melbourne/plan-melbourne/20-minute-neighbourhoods</a> (Accessed: 29 March 2020)  <sup>5</sup> Sustrans (2019) Sustrans Manifesto for UK Government. Available at: <a href="https://www.sustrans.org.uk/media/5211/sustransmanifestoukgovernment.pdf">https://www.sustrans.org.uk/media/5211/sustransmanifestoukgovernment.pdf</a> (Accessed 29 March 2020).  <sup>6</sup> The Mayor of London (2019) <i>London Plan</i> Available at: <a href="https://www.london.gov.uk/what-we-do/regeneration/advice-and-guidance/about-good-growth-design">https://www.london.gov.uk/what-we-do/regeneration/advice-and-guidance/about-good-growth-design</a> (Accessed 29 March 2020).</p>
39	Solomon Green	Protecting Heritage and open land. Current population should ensure that Culture will remain and develop without the need for any Council interference, except for the protection offered by strict planning regulations. Delivering more affordable homes. Helping business to grow.
40	Jamie Edwards	Basic infrastructure. Quality of Roads. Street cleaning. Quality of open spaces for families. More doctors appointments. More dental appointments. More Police on our streets.
41	Anthony Swan	Environment, especially Economy, Schools, Transport, Policing, Older people, Hospitals. There comes a time with housing where you have to say we are full up. Don't just rely on charities to give every rough sleeper a choice to sleep under cover.
42	Jeremy Gill	Stop wasting time and energy on attention seeking grandiose visions and instead concentrate on what we pay you for, which is to look after our communities in meaningful ways, like protecting our people from anti-social behavior.
44	Roger Cutler	More parking. Using the previous administration's plan for Twickenham Embankment rather than waste more money. Provide more medical & social care as a priority with the money saved. House rough sleepers. Eradicate drug use in the schools.

Respondent reference no.	Name / Organisation	Detailed comments
54	Sally Beeson	Trying to keep our borough as safe, green and beautiful as it can be without sacrificing it to greedy property developers who put nothing back into our local communities.
46 (a)	Joan Gibson	Biodiversity and reducing to a minus fig our emissions
47	Trevor Rowntree	Reduction of population to solve the housing crisis in this area.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
49	Margaret Edwards	Sustainable development, increase in affordable housing, improving air quality (possibly controls on wood burners, incentives to move away from diesel powered vehicles), challenging extension of Heathrow and increase in flights, incentivising travel by foot, bike and public transport (especially for journeys to school and local commutes)
50	John O'Brien	Encourage greater citizen involvement using new technology to the full e.g. the app Fix My Street allows everybody to bring problems to the attention of the council including specific location and a picture if relevant. Council should have a policy of updating these issues and logging when they have been addressed/fixed.
51	Su Bonfanti	I very much support the need to accommodate the necessary growth in housing and employment infrastructure. I think many people don't realise how much employment there is in the borough or that the Local Plan needs to protect land for employment purposes. I don't think it's important to have individual policies/strategies for different parts of borough. This has been done once in recent years by a previous administration, to produce Village Plans. And frankly, for East Twickenham, I think the process took a lot of resource, including in the community, and has delivered next to nothing. But clearly I would want the emphasis to be different in different places depending on the current state of play.
52	Winston W Taylor	1. Climate change obviously 2. Housing 3. Air quality 4. Reducing parking
53	Richard Woolf on behalf of McDaniel Woolf Architects	A realistic expectation of residents need to develop an evolve their places of habitation and an acknowledgement that ' matching what exists ' as the only architectural response isn't the viable choice for the 21st Century .
54	Paul Luton	Action on climate change should inform all aspects.
55	Jon Rowles	Need to think about the ordering of priorities - as Climate Emergency becoming before housing is likely to cause conflict with the Government Inspector. - Need to identify green chains and wildlife corridors better - need to state clearly your objective is to improve people's quality of life (this is mentioned time and again in Government Documents of Sustainable Development).
58	Michael Atkins, Port of London Authority	The PLA considers that the vision for the new Local Plan must include reference to the boroughs various waterways, including the River Thames, and the role that these can play in combating climate change through increased use and enjoyment of these areas.
59	Paul Massey	Protection of OOLTI and heritage sites
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Richmond's priorities in the new vision are clearly set out in the 10 themes listed on page 12 of the consultation document.
62	Kathleen Massey	Preservation of our historic locations and buildings. Richmond Park to be maintained to the highest standard. Traffic issues throughout the borough should be much better managed and road works properly coordinated to avoid the regular disruption they cause, especially on the single road through Ham that links Richmond to Kingston.
63	Carol Rawlings	1. More re-wilding to protect wild life throughout the borough and reduce pollution and our carbon footprint. We have a responsibility as a lung for London. 2. Reduce vehicle use to a minimum and encourage electric transport.
64	Johanna Eschbach on behalf of Richmond	The 10 objectives of the Council seem right but overly ambitious (can we really deliver all of this in a meaningful way?). We would like to know what top 3 objectives will be the focus and where the focus of the investment will be. Some of these objectives – although very noble – seem a bit out of reach: “an affordable borough for

Respondent reference no.	Name / Organisation	Detailed comments
	Bridge Residents Association	all", "reducing the need to travel" or very unspecific "respond to climate emergency". By looking at a bit of everything, there's a doubt we can deliver anything in an ambitious way. Key priorities as per feedback from our members: 1. Tackle air pollution 2. Address traffic congestion and lack of parking for residents 3. Reinvigorate high streets and protect the Conservation areas
66	Robert Philip Cunliffe	Young people, Law and Order, sustainable jobs
67	William Mortimer	Preparing for a society which is more and more influenced by the rise of the Internet and robotic solutions in manufacturing, service industries and also charitable bodies providing local care solutions. Ways are needed to keep the whole spectrum of local people physically and mentally stimulated as well as safe from scammers. A well-balanced society relies on maintaining physical and mental health as well as benefiting from the undoubted positives of a linked up technological world. Our economic recovery will depend on a capability to continue to deliver the local government services and to prime independent businesses to get the economy going again when the virus has been defeated. To give a critical example today, banks must be required to provide vestigial cash services for disabled or elderly people without any educational or vocational experience of digital banking. It is vital to the well-being of elderly and infirm citizens that they be able to continue life in a cash economy. Government centrally and locally has not been supportive of efforts made by local people to require the banks to maintain a service. As a result the predicted isolation of a whole raft of our society is to be seen. The current provisions for people put out of work by the Covid-19 virus is huge and we must anticipate a period of time in which the government will be obliged to reduce National Debt.
68 (a)	Mark Jopling	Climate change, biodiversity, green space. There is no Planet B.
68 (b)	Mark Jopling	World-leading green sustainable society, if not here where else ?
69	Geoff Bond on behalf of Ham and Petersham Association	Protecting green spaces and the character of conservation areas
70	Melissa Compton-Edwards	- Ensuring that Green Belt and MOL sites are NOT allocated for development. - Ensuring that all development is low-carbon and car-free/car-lite and that PTAL rating is NOT used as an excuse to permit developments with private car-parking. - Developing a rating(s) system that takes account of active travel provision as well as public transport provision. -Ensuring that development is NOT permitted in areas with illegal levels of air pollution. - Maintaining and enhancing the character of the borough (which includes not approving ugly 'bog-standard' 'could be anywhere' brick lump designs like I very much fear the design for the secondary school will be on the Mortlake Brewery site). I share the Richmond Cycling Campaign's view that LBRUT's new vision should focus on sustainability, and the embedding of its new transport hierarchy in all its work. As part of London, the borough should also focus on how delivering sustainable transport options requires partnership with other authorities.
<b>Have we covered all the key issues and overarching challenges facing the borough in the ten themes above or is there anything missing?</b>		
Of respondents who answered the question: 14 said yes, 14 said no and 4 said don't know [6 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	We do not feel there has been enough co-operation with Kingston Upon Thames and Hounslow Councils – as they need to meet some of our unmet housing requirements – and we note they both have 'opportunity areas' next to our borough. The NPPF 35a States local plans have to be... "Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development." We feel the council need to set out what, if any, unmet needs neighbouring councils have agreed to meet. There are benefits of extra density, such as better shops, more night life, cultural institutions and better opportunities for businesses. Need to provide jobs for a percentage of the new residents – otherwise there will be extra strain on public transport and roads.

Respondent reference no.	Name / Organisation	Detailed comments
31	Tim Catchpole on behalf of MESS	Nothing missing.
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	<a href="#">As above.</a>
39	Solomon Green	Before this Borough gets too excited by the wildly exaggerated "climate crisis", a thorough scientific investigation should be undertaken as to whether this borough is a net producer of CO2. If it is then priority should be given to planting even more street trees. and nursing them for the first few years. Too many die in the first five years after planting because they are not properly maintained.
40	Jamie Edwards	You should introduce a quality of life / happiness measure for the borough so we can see the impact of your efforts on people's overall feeling of well being. You're also focusing on doing too many things. Having 10 areas of focus will dilute resources, brain power and funding. Pick 3 that will really transform residents lives, and focus on those 3 relentlessly.
41	Anthony Swan	Don't know if anything missed without knowing the detail
42	Jeremy Gill	Willingness to change your minds about anything. For instance, your policies about vehicle use and pollution ignore the massive energy cost of scrapping old vehicles before they are worn out and manufacturing new ones. The damage has already been done - they were built. The least damaging thing to do with old vehicles is to use them until they fall apart. This energy cost is borne by the whole world, not just Richmond.
44	Roger Cutler	Everything I mention in question 8.
46 (a)	Joan Gibson	Council needs to build social housing. All contracts and changes need to work cross borders (unlike the current bike hire contracts).
47	Trevor Rowntree	Over population
49	Margaret Edwards	Given housing shortage and rising ageing population the needs for specialist housing for older people and every home to be a lifetime home in new housing developments seem to have been omitted.
50	John O'Brien	I've done that above. I also note that no children approaching secondary school age in North Kew have automatic access to any of the Secondary schools in the borough - surely Christ's is the obvious one.
52	Winston W Taylor	None - at the moment.
53	Richard Woolf on behalf of McDaniel Woolf Architects	New bridge crossing opportunities. Please refer to your WSP Report of October 2018. <b><i>[A copy of the WSP Report was provided, which is available at <a href="https://www.richmond.gov.uk/media/16409/thames_bridge_feasibility_summary.pdf">https://www.richmond.gov.uk/media/16409/thames_bridge_feasibility_summary.pdf</a>]</i></b>
55	Jon Rowles	- The housing market for people needing Housing Benefit isn't based upon the Borough boundary but the Broad Market Rent Areas (BMRA) and this needs to be explained in the Local Plan with the boundaries shown. The Government expects people to be mobile and find housing within the BMRA - but this document seems to be taking a different approach. If you take into account BMRA much of the 'shortage' disappears. Need to deal more explicitly with an ageing population
58	Michael Atkins, Port of London Authority	From the ten themes that have been identified that will inform the new vision for growth in the borough the PLA consider that the them on increasing biodiversity must refer to green and blue spaces rather than just green, to recognise the importance of blue spaces in the borough including the River Thames, particularly as the London Borough of Richmond Upon Thames is the only borough that spans across both sides of the Thames and serves as a key asset for the borough.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Nothing is missing.
63	Carol Rawlings	These questions should come after the local plan. I can't find a link to the plan so can't actually read it.
64	Johanna Eschbach on behalf of Richmond	What is missing: - Increasing the wellbeing of residents through addressing significant disruptions (noise pollution, traffic, air traffic, etc.). To define this further, the Council should

Respondent reference no.	Name / Organisation	Detailed comments
	Bridge Residents Association	refer to specific guidance and guidelines from the WHO. This is critical for physical and mental health of residents - Tackling an increasing level of crime
66	Robert Philip Cunliffe	already included in my responses above
67	William Mortimer	Until the Local Plan provides cross-referencing to the Disaster Management Plan the effort is incomplete. The flooding experience in the Midlands this winter could equally well happen here and hence the Local Plan must fit with the Environmental Agency Plan, the provisions of the Lifeboat Service, the Port of London Authority, police and military.
68 (a)	Mark Jopling	Real focus on making our Village High Streets thrive . Support independent traders, there will be a change in consumer behaviour over the life of this local plan, many people, especially in affluent Boroughs will switch to smaller more ethically sourced products and produce. Big box retail is in decline, Smaller supermarkets will survive, the 2 new Lidl's fill a gap in the local market.
68 (b)	Mark Jopling	Is the space re-allocation radical enough ?
69	Geoff Bond on behalf of Ham and Petersham Association	The importance of preserving conservation areas, OOLTIs and OSNIs
<b>(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?</b>		
14	Mayor of London	<a href="#">See also comments in Section "Increasing jobs and helping business to grow" relating to the location of office development.</a>
29	Richmond Cycling Campaign	We can't comment directly on site choice, but we would stress that all new developments ought to be car free. If PTAL is too low for it to be considered car-free, then the solution for this is to improve PTAL, and not to simply dedicate expensive public space to car parking and driving. The suggestion has been made of an Active Travel Availability Level a good value of which would compensate for a lower PTAL. The Stag Brewery development is an excellent example of this - there's enough road space in the area for a development of this size only if we provide for and prioritise active travel and public transport.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	To areas close to the new Crossrail 2 scheme are suitable for flat building if they are within walking distance of the new stations The National Infrastructure Commission in their report Transport for a world city state on page 13 "Crossrail 2 will need to have buy-in from the GLA and London boroughs along the route as well as counties and boroughs outside of London which benefit from the new line. All parties will need to ensure the housing unlocked by Crossrail 2 is sustainable and meets the needs of Londoners and those in commuter regions around London." With four new Crossrail stations; how many housing units do their business case pencil in for LBRUT? <b>[See Appendix for map]</b>
31	Tim Catchpole on behalf of MESS	Near railway stations and atop car parks, notably at retail parks, or indeed in place of retail parks
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	Major development should be in locations that with high PTAL and enabled to reduce car dependency.
39	Solomon Green	Nowhere, because to do so would alter the whole character of the Borough. The problem should only be addressed when the existing brownfield sites have been exhausted. This should take at least fifteen years.
40	Jamie Edwards	You should focus on supporting existing business. And quality of existing residents lives. Not bringing in new retail / floor space, or bringing in more people.
41	Anthony Swan	If by growth you mean building then there are lots of places where NOT to build. Personally I don't know anywhere that would be a likely building target. The likely target of Teddington studios has not worked well has it... Just as major investments are being made at Pinewood etc.
42	Jeremy Gill	Since we have left Europe the economic, social and demographic conditions upon which any current plan can be predicated are liable to changes impossible to predict at this time. You're not very good at directing development, so don't. Instead of having a policy and slavishly following it, try making decisions on a case by case basis. You overstate the influence that policy has on development, which happens more by accident than you would be comfortable admitting. I recommend the council not try to direct development by having a policy. It will be rendered obsolete by events before you've even decided what it is.

Respondent reference no.	Name / Organisation	Detailed comments
44	Roger Cutler	More car parks for shoppers & pub & restaurant users. More & larger scale developments need more parking with more electric charging points for a greener car future. More places for young adults to spend time. Might stop all the anti-social behaviour. More sports facilities.
54	Sally Beeson	I agree that brownfield sites could be built upon as well as town centres. After that i totally reject the idea that more building would enhance any of our lives for the better.
46 (a)	Joan Gibson	You should have 100% of development on brown field sites. There is no excuse for building on green sites and making the climate emergency worse.
47	Trevor Rowntree	Development should be concentrated on facilities for the residents rather than any more housing developments.
49	Margaret Edwards	Several opportunities to develop housing on brownfield sites have been lost (Wickes site, site where new school and Lidl being built in East Twickenham), already plus development of standard family housing or flats on brownfield sites that could have met the needs of ageing population (Brewery Lane, and over Twickenham station, Richmond police station). Developments outside town centres only work if transport links are good.
50	John O'Brien	Ham
52	Winston W Taylor	We have if I remember correctly about 6 years of building land. Lets see what the suggestions are to the request for land for building.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Reordering of our redundant retail spaces.
55	Jon Rowles	Many of the supermarkets and out of town shops are hugely space inefficient with large amounts of surface parking and only one or two stories. Need to include brief for sites such as the large Sainsbury's in Hampton St Clares, Homebase in Hanworth, surface car parks at Twickenham Stadium, Kew Retail Park etc.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	New growth could be directed to underused sites with redevelopment potential or where opportunities for housing densification or intensification and or mixed use incorporating housing is possible (e.g. car parks sites), particularly within town and local centres or edges of these sites.
63	Carol Rawlings	I can't find the plan so can't comment.
66	Robert Philip Cunliffe	I would urge extreme caution on any "growth" plans - at best as a minimum defer by 5 years
67	William Mortimer	It is not possible for me to advise you where the 'brownfield' sites in the Borough are located but I do support the intention of the Council to safeguard the urban green spaces. IT is vitally important that the Borough plays its part in the efforts to clean up the environment by 2050 at the latest. We need to see how fuels like hydrogen are to be delivered so that the only waste product of a motor engine or a home heating boiler will be satisfied and the sooner the better.
68 (a)	Mark Jopling	"Majority" is not enough, it encourages the speculator to "take on" the Council. The speculator can afford the most expensive advisors and barristers to drain Council resources and smash the Local Plan. All development should be focused on existing areas that are not Green. There are many locations that could be sensitively developed, using Twickenham Station scheme and the Lidl/School as a benchmark The car parks around Twickenham stadium are used a few times a year. They could have significant developments over them, with parking retained. (Wembley Stadium has created a whole community around it as a benchmark) Sainsbury at North Sheen, Sainsbury St Clares, Hampton and Tesco Twickenham could be rebuilt as multi-storey developments with food retail on the ground floor. CV-19 will further switch food distribution to on-line, these "superstores" will continue to decline. The Twickenham Station scheme could be a benchmark, develop the space above Richmond station including the multi-storey car park, would be major source of new housing located by transport hub
68 (b)	Mark Jopling	Redevelop Richmond Station using the template from Twickenham Station, including the multi-storey car park. Big-box retail is dying and massively space inefficient. Remodel the large supermarkets and DIY sheds into multi-purpose developments: 1) Tesco Twickenham 2) Build over the vast RFU car parks - see Wembley Stadium surroundings for what is possible 3) Sainsbury and Homebase North Sheen 4) Sainsbury Hampton St Clares

Respondent reference no.	Name / Organisation	Detailed comments
69	Geoff Bond on behalf of Ham and Petersham Association	These these two focus areas are all you need.
70	Melissa Compton-Edwards	As suggested by CPRE London, surface and multi-storey car parks could be redeveloped to make more efficient use of space and discourage car trips. All new developments ought to be car-free or car-lite. If the PTAL is too low for the development to be considered car-free, then the solution for this is to improve PTAL, and not to simply dedicate expensive public space to car parking and driving. Small-zone CPZs should also be introduced borough-wide to discourage commuter parking and unnecessary short trips within borough by car and prevent displacement parking by residents in new car-free/car-lite developments. The suggestion has been made of an Active Travel Availability Level, a good value of which would compensate for a lower PTAL. Mortlake's Stag Brewery is an example of a development which should be a car-free development, or car-lite (where the only provision is for disabled parking, deliveries and car club parking). Since most housing in Richmond has car parking available, there is no need for new housing to cater for private car-parking. Many residents cannot or do not want to live with a car, particularly older and young people, and those on low incomes. New housing should cater for these people and, in doing so, also reduce car trips in the borough. New developments can have car club parking only and sustainable transport hubs with cycle parking, delivery hubs etc.
<p><b>(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? - If you think there are there parts of the borough that could assist in accommodating growth, please tell us more.</b></p> <p>Of respondents who answered the question:  29 considered that we should continue to protect our green and open spaces from inappropriate development  3 considered that there are there parts of the borough that could assist in accommodating growth  [6 did not answer the question]</p>		
18	Phoebe Juggins, Department for Education	See also comments on the open space and playing fields.
28	Alice Shackleton on behalf of The Kew Society	This comment relates to the first option above [ <i>Continue to protect our green and open spaces from inappropriate development</i> ]: <ul style="list-style-type: none"> <li>• An implication of the wording of this question is that our protected green and open spaces could become available to assist in accommodating growth? Why else, posit the question in this way?</li> <li>• Yes, we must continue to protect our green and open spaces from inappropriate development.</li> <li>• There may be other parts of the borough that could assist in accommodating growth – these must be identified</li> </ul>
29	Richmond Cycling Campaign	As a general principle, we must protect these spaces. However, we'd also like to see our green spaces supporting active travel appropriately, and there are clear opportunities to improve walking and cycling routes around and through our green spaces.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The most obvious ones are the large out of town retail centres and large supermarkets. Fulwell Bus Station could also be redeveloped to produce and air-rights development above the bus depot. This could include some land set aside to increase the linkage between link Fulwell Golf Course and Strawberry Hill Golf Courses.
31	Tim Catchpole on behalf of MESS	We should certainly continue to protect our green and open spaces.
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	Green spaces should be protected as a valuable resource for residents and visitors.
40	Jamie Edwards	No. We don't need more people. Quality of life has been dropping in the borough over the last years. Cramming more people in won't help.
41	Anthony Swan	Udney Park
44	Roger Cutler	Twickenham Embankment. Restore the lost parking.

Respondent reference no.	Name / Organisation	Detailed comments
54	Sally Beeson	Telephone exchange on Teddington High Street Teddington Police Station
46 (a)	Joan Gibson	You appear to see inaccessible green land as inferior to green spaces with lots of visitors. So are justifying you can build on inaccessible green land. This is not true for wildlife and biodiversity - dark, undisturbed green land is much better in this instance and as this is all about climate emergency you should afford these sites the highest protection.
49	Margaret Edwards	If Ham/Petersham was better served by public transport there might be areas there where increases in density and use of small plots would be viable.
51	Su Bonfanti	I support keeping most green space protected even if some of it would not generally be regarded as high quality. Preventing unconstrained sprawl is as important as it ever was. However, I do think it is in principle possible to identify areas which are of relatively low quality and otherwise suitable for development, e.g. because they have good transport links, which could be released.
52	Winston W Taylor	My perception is that central Richmond, East Sheen, Mortlake, Kew and Barnes has not borne the brunt of housing development in recent years - and certainly not affordable housing. I am quite prepared to be shown that I am wrong about this but I think the policy should be to spread development including affordable housing evenly throughout the borough.
53	Richard Woolf on behalf of McDaniel Woolf Architects	We should have a 'grown up' conversation about Metropolitan Open Land within the borough and Conservation Area designation.
55	Jon Rowles	If areas are to be released they should be by the proposed new Crossrail 2 stations
67	William Mortimer	Please rephrase the second bullet point. It makes no sense. But in any case we must hang on to green space for the recreational use of our citizens or once again the mental health of the community will suffer. The Council should be putting funds in the direction of persuading old and young of every ethnic origin to use our green spaces more in an attempt to reduce future growing demand on public health services. As example, if the Council adhere's to its unsubstantiated claim that a senior school at Mortlake Brewery is necessary the community loses a sports field and the pupils have no obvious recourse to green field playing area for football, cricket, hockey and rounders.
68 (a)	Mark Jopling	This is 2020 - if we lose any more green space future generations will ask "what on Earth were you thinking of ?" London is the World's first National Park City, it is essential to protect the green space we have left "Inappropriate" is too low a threshold, it encourages speculators to challenge the Council in Planning disputes, causing a huge drain of public resources. This should be "All". The CPO legislation is sufficient that if there is genuine important public need for building on green space it can still go ahead (eg infill building on hospital grounds).
68 (b)	Mark Jopling	Stronger disincentives for speculative attempts to smash the Local Plan by building on Green Space. Council must be very strong from the start of any attempts to build on protected space for excess profit margins that waste huge public resources fighting off speculators who can afford Londons most expensive consultants and Barristers.
70	Melissa Compton-Edwards	So, so important to protect our green and open spaces from inappropriate development in this time of Climate Emergency and mass extinction of wildlife. Once they are gone, we'll never get them back, and as the Covid-19 crisis is demonstrating, they are vital for our physical and mental health. I support Richmond Cycling Campaign's desire to see our green spaces supporting active travel appropriately, and there are clear opportunities to improve walking and cycling routes around and through our green spaces.
<b>(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? [Please note Questions 11 &amp; 12 referred to by some respondents are those directly preceding this question.]</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	It is not just a question of proximity to stations but also the frequency of services. When London Underground took over some National Rail Routes and created a metro style service, this prompted developers to build thousands of new flats along the route. This experience should also serve as a warning to the council – have you looked at the impact Cross Rail 2 will have on housebuilding and subsequent demand on public services such as school places and GP practices?
31	Tim Catchpole on behalf of MESS	As mentioned in answer to Q12 above, i.e. atop car parks at retail parks or indeed in place of retail parks. <b>[ Additional comment in response by email]:</b> Retail parks (in addition to near town centres and stations)

Respondent reference no.	Name / Organisation	Detailed comments
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	<a href="#">As above.</a>
39	Solomon Green	See answers to 11 and 12
40	Jamie Edwards	None.
41	Anthony Swan	No idea
42	Jeremy Gill	Our town centres need more attention paid to the effects on general well being and service provision during the current economic conditions, you could direct some energy into practical regeneration on specific areas in need and not borough-wide.
44	Roger Cutler	Richmond Station . Extend like Twickenham Station.
54	Sally Beeson	Yes, near to town centres and stations
46 (a)	Joan Gibson	All - see my list of possible sites
47	Trevor Rowntree	None
49	Margaret Edwards	In Richmond Town Centre I would predict that House of Fraser store will close - an ideal location for extra care housing for older people as all facilities close by and would boost demand in local shops, cafes etc. Could housing be built on top of Richmond station?
52	Winston W Taylor	<a href="#">See 12.</a>
53	Richard Woolf on behalf of McDaniel Woolf Architects	Ham , Whitton and West Hampton
55	Jon Rowles	Most railway stations are already over capacity - so this will point to developments having to take place by the new Crossrail 2 Stations
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	See our response to question 11.
62	Kathleen Massey	Not central Richmond nor around Richmond Park. Not Ham and Petersham
63	Carol Rawlings	Twickenham
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Not in East Twickenham
67	William Mortimer	My suggestion of a catamaran service on the Thames travelling right up to Richmond would have included landing points such as Barnes Bridge and Mortlake Brewery. This would provide an alternative to road traffic and then maybe the space required for cars to be parked could instead be allocated to innovative industries (e.g. the vegetable growing enterprise occupying unused portions of London underground tunnels in the Waterloo area.
68 (a)	Mark Jopling	See 11. Comprehensive redevelopment of large food supermarkets and DIY superstores. "Big Box" retail is becoming irrelevant and will almost disappear by 2030.
68 (b)	Mark Jopling	Per 11; Richmond Station and Big box retail.
<b>Which areas of the borough may be suitable for more infill development and intensification?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Town Centres could accommodate a lot of development as there are often large service yards and back areas that are poorly utilised. However, it is important that adequate servicing space is retained.
31	Tim Catchpole on behalf of MESS	Main road corridors?

Respondent reference no.	Name / Organisation	Detailed comments
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	<a href="#">As above</a>
39	Solomon Green	See answers to 11 and 12
40	Jamie Edwards	None.
41	Anthony Swan	No idea
42	Jeremy Gill	None
44	Roger Cutler	Richmond.
54	Sally Beeson	Empty shops
46 (a)	Joan Gibson	All - see my list of possible sites
47	Trevor Rowntree	None
49	Margaret Edwards	See 12 above
50	John O'Brien	Mortlake riverside
51	Su Bonfanti	East Twickenham, where I live, is so constrained by roads, railways and the river that only infill and minor intensification is really possible. The Ryde House/Lidl/School site is by far the largest here and that's nearing completion. What I don't have a clear grip on is just how infill and intensification can be allowed without becoming a 'building on gardens' free for all.
52	Winston W Taylor	Await suggestions but 12 above is also relevant here.
53	Richard Woolf on behalf of McDaniel Woolf Architects	We should consider a plan approached response. With the exception of our ' key ' Conservation Areas.
55	Jon Rowles	There is still a lot of underutilised land in Twickenham and Richmond town centres - there may be a need for a full land-use opportunity survey to take place.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Small opportunity sites, underdeveloped/under-utilized, sites within 800 metres of train stations and town centres, subject to constraints.
63	Carol Rawlings	None. Climate change should be the primary consideration. We need all the green space we have in the borough.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Not in East Twickenham
67	William Mortimer	Not an easy request of people who know only the locations adjacent to their homes. I have supported change at the Barnes Hospital site and the proposals of the Love Mortlake group at Mortlake Brewery. The sad thing is that the impediment to these schemes would appear to be the Council. Why not identify sites that the Council has in mind and then consult on what could be reasonably be accommodated?
68 (a)	Mark Jopling	Development over Richmond Station similar though larger to the current scheme over Twickenham station. Massive area of dead space if extended to include the multi-storey car park.
68 (b)	Mark Jopling	Per 11
<b>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)?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Parts of Twickenham and Richmond Town Centres. However, the block has often been fragmented ownership so the council may need to be more willing to use compulsory purchase powers.

Respondent reference no.	Name / Organisation	Detailed comments
28	Alice Shackleton on behalf of The Kew Society	This suggests that the Council would be open to development that would be inappropriate in the borough and more appropriate in an urban rather than suburban setting. Is this taking a short-term view? One that would potentially destroy special "green" characteristics of the borough and/or cause irreparable harm to its heritage assets for what may well be short-term aims. We would expect there to be very few if any areas of the borough now suitable for such development but would be open to considering suggestions.
31	Tim Catchpole on behalf of MESS	Main road corridors?
39	Solomon Green	See answers to 11 and 12
40	Jamie Edwards	NO! NO! NO! We don't need more people. You can't find parking in our own streets already. Getting school places is a nightmare already. We don't need more people.
41	Anthony Swan	No idea
42	Jeremy Gill	Only for the worse. Blocks of flats are a horrible way to live, believe me.
44	Roger Cutler	Richmond Station.
54	Sally Beeson	Maybe
46 (a)	Joan Gibson	Yes - all council owned buildings and car parks like Whitton Community centre and Old Deer carpark - see my list of possible sites.
47	Trevor Rowntree	No
49	Margaret Edwards	The challenge in this is the impact on the character of an area, where large blocks dwarf houses. The subdivision of large houses into flats is quite common in the borough and this increases density without an impact on appearance. An alternative form of intensification is the development of home sharing and intergenerational living where couple/single people provide accommodation in their homes to other, sometimes in exchange for support/company/transport.
50	John O'Brien	Build over railway stations
51	Su Bonfanti	The number of empty shops in Richmond Town Centre raise the question of whether we reaching the point at which a move towards mixed housing/retail, more like an 18th century high street, is plausible.
52	Winston W Taylor	Almost certainly. The question is whether it is desirable. My view is that every case depends on its merits.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Ham . Ham Close. Whitton and West Hampton... specifically.
55	Jon Rowles	Most redevelopment would need to involve more than one dwelling being redeveloped to create an acceptable outcome. The majority of the single dwellings sitting on a large plot of land have a lot of heritage value.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Parts of the borough that could be transformed are Council Housing Estates sites as they offer scope for larger scale regeneration/ redevelopment involving housing intensification.
63	Carol Rawlings	The covid 19 pandemic should teach us that intensification is to be shunned. Civilisation is fragile.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Not in East Twickenham
67	William Mortimer	Be careful when you speak of 'blocks of flats'. The developments of high-rise buildings in the 1940/1950, for example at Roehampton led to isolation and vandalism. The best such developments are no more than four storeys high and there are convenient, safe green areas for play and recreation. Such complexes still need a concierge function to ensure that they are properly maintained and secure.
68 (a)	Mark Jopling	See 11. Complete re-think of space dedicated to "Big Box" retail.
<b>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)?</b>		
Of respondents who answered the question: 19 said yes, 3 said no and 9 said don't know		

Respondent reference no.	Name / Organisation	Detailed comments
[7 did not answer the question]		
<b>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)? - If yes, how could they vary?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	This is essential if the council discontinue village planning documents.  <i>If yes, how could they vary?</i> Some areas are closer to being metropolitan centres such as Richmond and Twickenham, whilst other places are more suburban commuter towns such as Teddington and Whitton. The quietness of Whitton and Hampton Hill etc, is part of their fundamental character that should be protected.
28	Alice Shackleton on behalf of The Kew Society	As different areas vary in their characteristics, yes we would like to see individual strategies. These already exist, however, in the Village Plans with their Character Areas, as well as Conservation Areas. The question does rather suggest that the Council would be open to altering or losing the carefully developed protections in local planning policy for areas and heritage assets – why would this even be open to consideration? <i>[If yes how could they vary?]</i> Refer to existing Village Plans, Conservation Area statements and SPDs.
31	Tim Catchpole on behalf of MESS	Policies can vary based on the Village Plans produced by the Council in 2016
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	Having developed area specific policies for our community through Neighbourhood Planning, we see this as a valuable way of identifying particular issues and objectives in a local area. However, projects need to be coordinated across local areas and boroughs. We encourage inter-borough cooperation as has been achieved between HPNF and North Kingston Neighbourhood Forum (NKNF) and LBRuT and RBK in the development of the Liveable Neighbourhood bid.
40	Jamie Edwards	I live in Twickenham and the lack of investment in our area is clear. Roads are looking run down. Pot holes everywhere. Shop fronts shabby. Rubbish littering the streets. No Doctors appointments available - yet more people are being rammed into the area via new BIG SCALE residential developments (Over station). Conversely, I don't see Richmonds centre showing any signs of wear at all and the streets are always clean. Clearly investment is being made in Richmond then centre, but not Twickenham. Why is this?
41	Anthony Swan	Lots would be similar but there would be individual unique differences and opportunities. eg ask about where protected cycle paths might go. Instead of just wjere houses might be built.
42	Jeremy Gill	By being different, don't be so lazy. One size does not fit all.
44	Roger Cutler	They have very different needs and operate differently. One size never fits all. Richmond has a flourishing traffic-free riverbank. This could never work in Twickenham with its working riverside.
54	Sally Beeson	Each area has its own distinct personality which local people know well.
46 (a)	Joan Gibson	We need to remove the view that certain areas are entitled to protection where others are less valuable so can be built on intensely. This just creates pockets of poor areas which are unpleasant to live in. Time to stop thinking Richmond should have areas of privilege.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Dependent on the geography of each area / ward
49	Margaret Edwards	Pros and cons to this approach. I can see for example that Hampton Hill and Ham has more problems with crime and anti-social behaviour than neighbouring areas, that Twickenham is impacted by proximity of Rugby Ground and St Mary's (positive and negative) etc. so might justify area specific plans. However the risk of separate policies is that in reality people use services, travel and move home across the borough. For example I'm sure that fly tipping is more of a problem in some areas than others but a borough wide approach would be needed to avoid problems simply being shifted.
51	Su Bonfanti	The key thing is to preserve differences in character, which includes accepting that some places are more 'ordinary' than others, e.g. East Twickenham is more village-y than Richmond, but it's also not got and in my view shouldn't aim for a Jo Malone or an Anthropologie.
52	Winston W Taylor	Not sure although I tend to Yes. I am in favour of decentralisation but am also in favour of a borough identity. Contradictory? Yes. But there must be a balance here.
53	Richard Woolf on behalf of McDaniel Woolf Architects	I think we already have area based strategies ....

Respondent reference no.	Name / Organisation	Detailed comments
54	Paul Luton	Better to have a coordinated approach. It is impossible to draw precise boundaries.
55	Jon Rowles	Some areas are more suburban such as Whitton, whilst Richmond is more metropolitan.
58	Michael Atkins, Port of London Authority	It may be useful to have specific policies for areas anticipated to undergo significant change through future growth.  The PLA considers that there must continue to be specific policies with regard to the boroughs river corridors, currently included in policy LP 18 (River Corridors).
62	Kathleen Massey	By careful consideration of the areas of historic interest in each part of the borough
63	Carol Rawlings	Depending on the individual character of each part of the borough and the need to protect all its green spaces.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Individual policy and strategy required for East Twickenham which represents an untapped opportunity in the borough. - Need strategy to develop the high street and make it more practical for pedestrians and a better place to live for residents. - Need specific policies to reinforce conservation area protection and develop heritage assets of the street The borough needs to build on the Village Plans.
66	Robert Philip Cunliffe	Must be fact based on assessment of the revised population growth (or shrinkage)
67	William Mortimer	There would thereby be an appreciation of the geographical, demographic and historical attributes of each area and, instead of the current 'one-size-fits-all' policy the developments would be tailored so as to retain the heritage of each area. Remember that Hamstead's abundance of green areas was the result of lengthy and historic battles with land owners. The Heath now provides a recreational lung for surrounding communities. By the same good fortune Barnes has the virtue of its Common, The Wetlands, Leg of Mutton, the Green with its Pond and the verdant Tow Path for Londoners to enjoy. These must be defended for future generations. It is also why Mortlake must be given protection as an historic site. William the Conqueror marched from Hastings to Southwark and thence to Mortlake immediately following his success against Harold before turning south to Guildford to cement the invasion.  The announcement in the Evening Standard following the unacceptable Council decisions on development of the site seems to think the history of the area started with the brewery. Either a lazy reporter or one who has been misled would you think? What ignorance of the site if this very impression has been underlying decisions by the Council or the Developer.
68 (a)	Mark Jopling	Focused on keeping communities and independent business thriving.
<b>Can you suggest any other ways we could accommodate future growth and new development, ensuring support for sustainable communities?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Much of the existing growth hasn't been properly accommodated, so there is also a 'catch up' requirement. Future growth would be better accommodated if the service roads behind shopping parades / town centres were adopted. A large number of units are being created by converting maisonettes about shops into four or five single bedroom flats – but roads have not been adequately upgraded. Often badly lit, large numbers of potholes, and no proper bin storage. <b>[See photo in Appendix]</b> Result of lack of bin storage for new flats; squalor. Location: Bridge Way entrance to service road to Whitton High Street
31	Tim Catchpole on behalf of MESS	No
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	The HPNP <sup>7</sup> identifies 'Opportunity Areas' and sites.  Reference: <sup>7</sup> The Ham and Petersham Neighbourhood Forum (2019), The Ham and Petersham Neighbourhood Plan Available at: <a href="https://www.richmond.gov.uk/media/16749/hpn_plan_2018_to_2033_january_2019.pdf">https://www.richmond.gov.uk/media/16749/hpn_plan_2018_to_2033_january_2019.pdf</a> (Accessed 29 March 2020).
39	Solomon Green	There are many ways but only if the Council is prepared to sacrifice some of the current Heritage, Culture and open land which makes the Borough so attractive to overseas tourists, visitors from other parts of Britain and residents of London.
40	Jamie Edwards	NO. No more people please.

Respondent reference no.	Name / Organisation	Detailed comments
41	Anthony Swan	Yes. But NOT building houses
42	Jeremy Gill	Yes, stop talking about growth. it's not going to happen in any way that you could meaningfully plan for. You do us all an injustice by stating so.
44	Roger Cutler	Only by reducing Business rates, improving road & pavement surfaces & putting in more car-parking.
46 (a)	Joan Gibson	By building above offices in business parks, car parks, large shops like Tesco Rugby Road, council owned buildings like community centres - the list is actually endless and can more than swamp the small amount of housing you need to build each year (and all on brown field sites which you can add greenery).
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
49	Margaret Edwards	see 15 above
50	John O'Brien	Build council houses
52	Winston W Taylor	Not enough time to think this through.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Footbridges are the way forward... please support the second stage WSP report.
55	Jon Rowles	- Need to consider the Broad Market Rent Areas, and what impact there would be if they changed. - Need to cooperate with Hounslow and Kingston Upon Thames Councils regarding office space and employment priorities.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	See our earlier responses.
61	Tom Minns	Developing office space into housing. This space will come through Covid 19 closing businesses and the increase of working from home that will carry on post crisis.
63	Carol Rawlings	Given the fragility of human life and civilisation, we should concentrate on developing green spaces and any development projects need to be carbon free.
67	William Mortimer	On what premise is growth planning taking place? The anticipated increase in demand for secondary school places has been shown to be wrong at Mortlake. As a result of corona virus we see the country will switch more and more to working from home via the Internet and 5G telephones. Manufacturing in our area which once thrived is now a vestige of former years. Our demography results from an inrush of highly educated and highly paid entrepreneurs operating in a worldwide market place. Making things in the UK will rely on technological innovation and specialist manufacturing more typical of the University Cities like Cambridge and this will happen alongside successful financial services offered in the City of London. If the Council fails to describe its own prescription for a growing 'New Age' vision for this Borough it is difficult to comment usefully on the question raised. Perhaps some research on this topic should already have taken place with the Universities in our area. Are they truly competitive? Is there a need that could be satisfied in co-operation with the Central London Universities?
68 (a)	Mark Jopling	Richmond to become a Borough the leads the green economic revolution,
68 (b)	Mark Jopling	Protect local High Street independent traders, Business Rate reliefs etc
<b>Responding to the climate emergency and taking action</b>		
<b>Do you agree with the proposed policy directions?</b>		
Of respondents who answered the question: 18 said yes, 6 said no and 5 don't know [9 did not answer the question]		
14	Mayor of London	The Mayor welcomes the elevation of the importance of tackling climate change across the borough, making it the very first key objective in the Direction of Travel document. This approach is in line with the Mayor's Good Growth Objective GG6 and his aim that London be a zero-carbon city by 2050. Further policies on addressing Climate Change can be found in Chapters 8 and 9 of the Intend to Publish London Plan.
15	Transport for London	<a href="#">See comments in General section.</a>

Respondent reference no.	Name / Organisation	Detailed comments
		We welcome the Council's commitment to addressing the climate emergency and housing crisis and its recognition of the importance of transport in achieving this, as well as tackling other health and environmental challenges. We strongly support the Council prioritisation of the needs of sustainable travel users, which will help to discourage the use of private vehicles and improve air quality. This will also help achieve the borough's ambition of making walking, cycling and public transport the modes of choice when travelling to and from new developments.
20	Gary Backler, Friends of the River Crane Environment.	We are disappointed that this is couched entirely in terms of development, and those aspects of development that can be tailored to the climate emergency. A balanced response to the climate emergency would recognise an equally or more important role of managing and improving green spaces, river and riparian courses, wetlands and sustainable drainage systems. "Maintaining and enhancing the green infrastructure network" is just a single bullet well down a list of planning policies to "develop in a way that respects environmental limits" (pp15-16). The policies lack any proposals for enhancing open spaces that are of equivalent specificity and detail to those for green roofs and smart meters, for example. "What do we have to do?" (p17) is focused much more on how to "deliver high quality sustainable development" than on how to improve green infrastructure to promote the low-carbon society.
22	Jimmy Wallace, Richmond Athletic Association	We broadly welcome and support the proposed approach to developing appropriate planning policies to tackle the climate change emergency. On p.17 a series of 'policy directions' are discussed and to provide a co-ordinated approach with the borough's overall vision and spatial strategy, it would be worth ensuring that the specific climate change policies make it clear that direct most development and growth in the borough to the most sustainable locations in transport and access terms can assist in helping to tackle the climate emergency.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	Responding to the climate emergency and taking action 15. We broadly support the Council's Climate Change Emergency Strategy approved in January 2020 and the Council's Air Quality Action Plan and in particular actions to reduce the high levels of NOX and particulates in Central Richmond in view of the substantial harm to the health of residents, visitors and employees and particularly the vulnerable. 16. We note from the DfT's current consultation on Transport De-carbonisation that in 2016 Transport represented 26% of carbon emissions, energy supply 23%, Business 18% and residential 15%. We also refer below in the transport theme to carbon and air pollution in Central Richmond. 17. We support research into decentralised energy opportunities recognising that Central Richmond might be a candidate for early consideration. 18. Buildings around the Green, because of their age and listing, are difficult to insulate and install new technologies for heating and generating power. 19. We broadly support initiatives on the circular economy and note the negative impact on the environment in Central Richmond, the Riverside and the Green from refuse on the streets, the open spaces and in the river Thames itself. 20. We support recognition of the potential impact of climate change on tides and flooding and the potential impact on the Riverside. 21. We believe the policies in the current Local Plan covers climate change and air quality issues adequately and if further amplification is required we would suggest that it could dealt with by subsidiary planning tools.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	We broadly support them. However, the existing policies are often not carried out in practice because so many developers claim extenuating circumstance. There is also appears a non-existent inspection regime for ensuring that things like green walls and roofs are maintained. The council needs to have a policy on this put in conditions in planning applications for access to periodically inspect them. For example, the green wall at Twickenham School Sports Hall is much smaller than its supposed to be, and the green wall on the RFU energy centre on the MOL next to the Duke of Northumberland's River has no plants on its green wall.
35	Alice Roberts, CPRE London	<b>The Local Plan must draw critical links to transport targets, and air quality and climate emergency action plans</b> As transport is the largest emitter of Greenhouse Gas emissions the borough should encourage car-free/'lite' development as well as advocating a shift in travel behaviours to more sustainable modes of transport. The Local Plan should directly reference the borough's targets: <ul style="list-style-type: none"> <li>• To reduce car trips from 41% of all trips to 25% of all trips</li> <li>• To increase the number of Richmond residents doing at least the 20 minutes of active travel they need to stay healthy each day, from 36% to 70%</li> <li>• For 72% of the population to be 400m from the strategic cycle network (have access to a safe and pleasant cycle network)</li> <li>• To reduce the number of people killed or seriously injured on Richmond's roads from around 70 per year to zero</li> </ul>

Respondent reference no.	Name / Organisation	Detailed comments
		<ul style="list-style-type: none"> <li>Additionally, to reduce car ownership, traffic volumes and air pollution, and to improve bus times, and for more people to be using public transport (targets in TfL's LIP3).</li> </ul>
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	<p>Achieving high standards of sustainability and addressing climate change is supported in HPNP (section 8) Transport comprises the largest source of carbon emissions at 27% and 40% of trips are under 2 miles. New development should address this significant contributor to climate change:</p> <ul style="list-style-type: none"> <li>Be located near to good public transport and/or improve public transport.</li> <li>Enable new residents to travel sustainably and by active travel through the provision of attractive, direct and safe infrastructure for walking and cycling to local town centres and transport hubs as part of the development.</li> <li>Reduce car parking and increase convenient and secure bike parking and provision of cargo bike and car share schemes.</li> </ul> <p>Residential energy use comprises 15% of carbon emissions<sup>3</sup>. The plans acknowledges higher standards in new development, but with most of housing stock existing and in conservation areas and/or heritage status, the plan should support for future proofing existing housing stock including that of heritage status. Reference: <sup>3</sup> London Borough of Richmond upon Thames Climate Change and Sustainability Strategy (2019) Available at: <a href="https://www.richmond.gov.uk/media/17738/climate_change_and_sustainability_strategy_2019_2024.pdf">https://www.richmond.gov.uk/media/17738/climate_change_and_sustainability_strategy_2019_2024.pdf</a> (Accessed: 29 March 2020).</p>
39	Solomon Green	There is no climate change emergency. CO2 is a greenhouse gas but only the third most potent out of at least twelve in our atmosphere. Out of 90 IPCC approved CMIP5 climate models, the forecasts of only one, a Russian model comes close to replicating the observed increase in global warming. All the others have produced forecasts that were way above acceptable margins of error. This part of the plan smacks of panic.
40	Jamie Edwards	There is no climate emergency in the UK. It's china, the US, Russia and India that produce all the pollution. We contribute 1% of Global Co2. You have other priorities
41	Anthony Swan	I have not read the Climate Emergency Strategy doc of 2020. I agree key Issues.
42	Jeremy Gill	You don't have direction. The above is just box-ticking. You covered your arses, well done.
46 (a)	Joan Gibson	I am concerned about the speed of response to the climate emergency. An emergency needs quick / immediate action. The timetable for this addendum suggests you will not take action until 2024 at the earliest. A quicker response is needed with adoption in 2020.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	We should: promote walking, public transport and cycling, and stop use of cars and vehicles across the Borough.
55	Jon Rowles	Jumps straight into zero carbon - need more of an introduction and how to avoid past mistakes such as diesel cars better due to less CO2 despite the increase in other pollutants.
61	Tom Minns	Cars are not necessarily the work of satan that you present them as.
63	Carol Rawlings	Development of Ham goes against the policy directions as it is far from any town centre.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We support zero carbon standards for all development not just large schemes; we are conscious that much development in Richmond is technically not large scale, but it may still have significant impact locally, e.g. the redevelopment of Ryde House in East Twickenham for a supermarket and school. In assessing any significant development, its wider impact on the borough's carbon footprint, both directly and indirectly - through traffic generation for example - must be considered. - We are concerned that current practice on Flood Risk Assessments is inadequate: they are entirely tick box documents which always conclude that a new development, even with a basement, will not increase flood risk to other properties. Water has to go somewhere, and cumulative small scale developments seem likely to undermine the overall direction. Is it possible to provide more information on practical proven solutions, eg for small scale sustainable urban drainage, and to insist on them for all proposals? 4 We support the council's focus on concrete action to improve air quality, and contributing to the global effort to address climate change, but are unsure whether the current policies will lead to sufficient action.
66	Robert Philip Cunliffe	Directions yes, however the ambition of speed of achieving them is FAR to slow
67	William Mortimer	Within the limitations described in earlier answers

Respondent reference no.	Name / Organisation	Detailed comments
68 (b)	Mark Jopling	Yes though not strong enough in presumption of protecting Biodiversity and Green Space. Richmond can best honour Sir David Attenborough by committing to leading London on green Policy, as part of "National Park City"
<b>How can we promote high quality sustainable development as part of a new Local Plan?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to show homeowners and developers how it can be done more economically as an intrinsic part of the design rather than a last-minute add-on. Smaller developers and homeowners are less likely to have the ability to cost control and can be at the mercy of architects creating an expensive bespoke scheme – and this often results in the environmental aspects being sacrificed. When allowing new housing to be built you must ensure that you can provide the school places locally – otherwise there is a massive environmental impact of having to accommodate the pupils in an out of area school. This recently occurred with Turing House School development in Whitton, but where most of the pupils will come from a catchment area based in Teddington. A key principle in sustainable development is proximity, and this needs to be made clearer in the new local plan.
28	Alice Shackleton on behalf of The Kew Society	This is already dealt with in the adopted Local Plan and appropriate SPDs and insofar as the draft London Plan would create new or more rigorous requirements, the adopted Local Plan can be altered to conform.
31	Tim Catchpole on behalf of MESS	Ensure less hard surfacing and protect soft ground for soakaways.
39	Solomon Green	Employ experts (from) both sides of any argument to analyse and criticise all suggestions, so as to lessen the chance of getting it wrong.
40	Jamie Edwards	It's a false flag. A vanity project. There are other priorities.
41	Anthony Swan	Thermal and Energy criteria could be defined and enforced by Planning and Building Control
42	Jeremy Gill	You can't. It will either happen or it won't. What you need to is manage it as it happens.
43	Paul Hart Prieto	One challenge for the resident is that the cost of low carbon energy sources is too high. One example is the need to change a heating system on a residential property. to install a new Gas boiler costs 3 to 8 thousand pounds. for an Airsource Heat pump its 11 to 20 thousand pounds. Even with RHI returns over 7 years the initial and upfront cost makes low carbon heating (as the grid changes its mix) is still a barrier for the home owner. More could be done to incentivise as well as plans for communal based heating conversion for residents i.e. shared ground source heatpump on a street. certified richmond installer with an economy of scale on purchase of equipment etc.
44	Roger Cutler	More car-parking so people don't have to drive around searching for spaces. Many, many more battery charging oints for all the battery cars to come. Re-institute dredging to reduce flooding. Ensure no developments in flood areas such as the embankment in Twickenham. Use better planners & developers not the cheapest.
54	Sally Beeson	Use building companies which use methods which chime with the Council's views
46 (a)	Joan Gibson	I feel you are starting from the wrong assumption when you say LBRuT already requires high standards of sustainable design and construction. The reality is this is just not the case and you accept the minimum standards outlined in the NFFP and London Plan. See THS, and Lidl developments in the Twickenham area. Your interpretation of carbon neutral is incorrect. THS is being built on a green field site – fully supported by LBRuT planning. The development will increase carbon emissions, but LBRuT have accepted very little green roof, biomass boilers and BREAM Good rather than excellent. This will all result in a development which will increase carbon emissions. If you believe this is a working practice where you require higher standards of sustainable design and construction then any change to the Local Plan will fail due to your low expectations. So you need to change your view of what LB RuT delivers now and have a target of delivering more than zero carbon developments.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
49	Margaret Edwards	Introduction of area wide heat/hot water systems - not sure how this is done in practice but in blocks of flats this can maximise space in each flat and reduce costs and greenhouse gases. Similarly use of ground source heat pumps in new developments and solar power.
50	John O'Brien	Build council houses - you set the standard and then deliver it.

Respondent reference no.	Name / Organisation	Detailed comments
51	Su Bonfanti	I support the general policy direction. I support zero carbon standards for all development not just large schemes; I know that much development in Richmond is technically not large scale, but it may still have significant impact locally, e.g. the redevelopment of Ryde House in East Twickenham for a supermarket and school.
52	Winston W Taylor	Engagement with the industry
62	Richard Woolf on behalf of McDaniel Woolf Architects	Work with Transport for London and the Port of London Authority on our key resource , the river.
54	Paul Luton	Needs to be integrated with the transport section that has been hived off below.
55	Jon Rowles	As the plan is supposed to be medium-term - there needs to be a mechanism so that standards are improved over time.
58	Michael Atkins, Port of London Authority	Ensure that as part of the construction stage of developments, full consideration is given to the use of the boroughs waterways as part of the transportation of construction materials and waste to/from development sites, either directly or via the supply chain.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Adopt planning policy approaches requiring large scale developments to be zero carbon and setting out a clear path to zero carbon standards for all types of developments.
63	Carol Rawlings	Encourage and help residents and commercial businesses with the installation of heat pumps, solar panels and other sustainable sources of heating. Take a lead in this with regard to council properties. Encourage cycling and walking by separating them from each other and from vehicle transport.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	- By not encouraging car traffic to the area and creating car parking in busy roads! - Having a sustainable travel plan
67	William Mortimer	Without a study using the experience of industries and universities setting forth the basis for the growth plan it is simply pie-in-the-sky to be asking this of the individual citizen.
68 (a)	Mark Jopling	Stricter penalties and disincentives for trying to develop protected space
68 (b)	Mark Jopling	Be more creative with the existing developed footprint
<b>How can we continue to set out a pathway to zero carbon?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Many houses in Richmond borough are installing air conditioning – thus thought needs to be given to how houses under the flight path can be cooled at night without having to resort to power hungry air conditioning School travel patterns have to be considered – may need extra developer contributions to secure sites for new schools otherwise we will lose more green space. Large event venues like Hampton Court Palace (which hosts flower shows and concerts) and Twickenham Stadium attract huge numbers of spectators who arrive by car. There is a need to reduce this – as they have a large CO2 footprint and can reduce local residents' quality of life if roads become gridlocked.
31	Tim Catchpole on behalf of MESS	Encourage greater use of alternative energy. Discourage car travel, particularly for shopping.
39	Solomon Green	Not to bother Carbon is one of the two most essential elements for all human and plant life..
40	Jamie Edwards	Impossible to achieve. The volume of Electricity required to go Carbon Zero in the UK by 2035 would require 26 Nuclear Power stations.It's a pipe dream.
41	Anthony Swan	Planning and building refurbishments should meet strict criteria and be ENFORED. Just like the eg Fire Regs
42	Jeremy Gill	Try turning a few lights off in your buildings that blaze away all night. Use less energy in other ways. You're setting out ways to use huge amounts of energy by doing away with things that are still good for purpose. A well constructed building that uses a lot of energy in the making is less wasteful than a poorly constructed low carbon structure that falls apart after forty years.
43	Paul Hart Prieto	Schemes to share new, low carbon heating across residential properties, replant larger woodlands in bushy park and richmond park, mandate all new builds have solar and wind, use waterways to generate heat and electric for the borough,

Respondent reference no.	Name / Organisation	Detailed comments
		<p>generate an economy of scale for residents with shared purchasing power of greener alternatives</p> <p>Autonomous "uber style" low carbon vehicles for the public to use.</p> <p>Hydrogen based public transport with intelligent routing based on demand</p> <p>etc.</p>
44	Roger Cutler	<p>Massively more battery charging points provided quickly. In the next 5-10 years the earth will cool anyway as it's orbit around the sun takes it further away. Better roads that allow traffic to get through more quickly. Widen roads &amp; reduce cycle lanes. Cyclists don't use them. They cycle illegally, &amp; dangerously, on the pavements. More car parking to get cars stationary so they don't pollute.</p>
45	Sally Beeson	<p>Fight Heathrow expansion and build sustainably</p> <p>Penalise parents who drive to local primary schools when their children only live ten minutes away by foot at most</p>
46 (a)	Joan Gibson	<p>Creating Carbon neutral developments is also not enough. If the world keeps emitting the same amount of CO2 as it currently does world temperatures will rise more than 1.5degrees. We have to plan to remove CO2 from the atmosphere. This is the target you should have.</p> <p>With the target to remove CO2 from the atmosphere new developments need to have:</p> <p>Rain water harvesting for toilets</p> <p>The highest level of lagging possible</p> <p>Double glazing</p> <p>Electric boilers, ovens and appliances to take advantage of expanding levels of "clean" electricity</p> <p>Lights that automatically turn off</p> <p>Appliance switches that shutdown so the appliance is not left on standby</p> <p>30% tree canopy and lots of hedges / grass / flowers (all native species). Keep the lawn area to a minimum as it consumes a huge amount of carbon via lawn mowers, feeds etc. etc.</p> <p>All hard landscaping / paving to be porous so rainwater will drain away</p> <p>All rain water runoff to go into soakaways</p> <p>Shower and bath water collection for watering the garden</p> <p>Routes for wildlife</p> <p>Bird habitats / boxes</p> <p>Insect walls</p> <p>All boundary fencing made up of hedges</p> <p>Full green roofs</p> <p>Wind and solar power capture</p> <p>Cooling towers</p> <p>Car free designs and marketing</p> <p>Separate walking and cycling access</p> <p>Cycling hubs</p> <p>Secure cycle storage</p> <p>Heat sinks</p> <p>Ground / air heat pumps</p> <p>Build must have zero defects as this reduces efficiency of lagging etc.</p> <p>Future proofing must be built in to reduce the cost of maintenance – so easy access to such things as boilers, electricity supply, pipes etc.</p> <p>Signs for anti-idling</p> <p>Signs to encourage active travel</p> <p>Waste management during construction and when occupied –</p>

Respondent reference no.	Name / Organisation	Detailed comments
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
49	Margaret Edwards	Not sure that it is feasible to do local things re domestic heating and hot water in existing homes as too costly to subsidise and unlikely that people will swap. Council could circulate info re links to websites re efficient boilers etc in the Council Tax bills.
52	Winston W Taylor	Again engagement with the industry. They have to know what we expect
53	Richard Woolf on behalf of McDaniel Woolf Architects	Keep stressing the need for sustainable transportation.
54	Paul Luton	Requiring the highest available standards for all new developments and promoting the improvements to existing housing stock.
56	Rob Kennedy, Environment Agency	Ban diesel lorries and buses from the borough, look at electric versions of both.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Encourage the development and expansion of decentralised energy networks and the re-use or recycling of used materials for as long as possible. Effective community engagement which encourages everyone to play their role in reducing consumption and greenhouse gases. The need to deliver high quality sustainable development should be maintained as a high priority for the borough.
61	Tom Minns	Free public transport for all. It would reduce car usage considerably as it has done with the senior citizen freedom pass. It really is a mind changer
63	Carol Rawlings	As above plus tree planting, wild flower and meadow cultivation, discourage private transport. Make Richmond town centre car-free? Close Richmond Park to traffic apart from between Kingston and Richmond. New buildings must be zero carbon and old buildings adapted to make them as near zero carbon as possible. Grants for solar panels and heat pumps. Free disposal of gas boilers.
66	Robert Philip Cunliffe	engage Imperial College to advise
67	William Mortimer	Alternative energy evaluation Must include hydrogen, heat pumps using sub-subterranean energy and mini cold-reactor nuclear technology. These have all been mooted in the engineering journals for years as well as wave and wind power and yet we need to understand storage solutions of electrical power and delivery of hydrogen gas will be possible before considering the feasibility of convert home boilers or building suitable cars.
68 (a)	Mark Jopling	Improved adoption of electric transportation Dedicated cycle routes
68 (b)	Mark Jopling	More EV charging and car-sharing infrastructure More dedicated cycle routes
<b>How ambitious shall we be in requiring zero carbon standards for all developments?</b>		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	14. We support zero carbon initiatives for all developments. We note the Appeal Court's recent decision concerning the inadequate account of the Paris Agreement in the Airports National Policy Statement 2018, and we observe that development policy more widely may have to pay closer attention to national commitments on climate change.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	We recommend having a mechanism so that standards can be increased as they become more affordable / widespread.
28	Alice Shackleton on behalf of The Kew Society	This would require zero carbon for major and non-major developments. That is an aim to be welcomed but consideration must be given to the reality of economic viability of compliance, for, say, work done to period properties/homes.
31	Tim Catchpole on behalf of MESS	We should aim for zero carbon by 2030 not 2050.

Respondent reference no.	Name / Organisation	Detailed comments
39	Solomon Green	Not ambitious just mistaken.
40	Jamie Edwards	You shouldn't. Quite frankly we don't need new developments or people. You should be using money to help existing residents become more energy efficient. We don't always need to obsess about GROWTH. Improving productivity of existing assets will make a bigger difference.
41	Anthony Swan	Totally ambitious and supportive at planning stage.
42	Jeremy Gill	Not very. Get value for your energy spend.
43	Paul Hart Prieto	Zero or negative mandates on new build Pragmatic cost based mandates on existing builds and council support for improvements
44	Roger Cutler	100%
45	Sally Beeson	Totally please, as there always has been a compromise halfway down the line I'm sure!
46 (a)	Joan Gibson	This is not ambitious enough you should require a net reduction in carbon emissions for the area - this is achievable.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Very - else London will flood in my childrens' lifetimes
49	Margaret Edwards	It should be possible for developers to achieve this so stick with it as a requirement.
52	Winston W Taylor	This is non negotiable if we are to meet the challenging targets.
53	Richard Woolf on behalf of McDaniel Woolf Architects	You should temper best option solutions at the time , against the perfection of a zero carbon community.
54	Paul Luton	The council has declared an emergency so as far as possible.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Set out a clear path to zero carbon standards for all developments, subject to viability and effectively monitor their implementation.
61	Tom Minns	Keep it in mind but don't get single issue fixated. It will be more effective if you can take people with you rather than imposing restrictions which people will fight.
63	Carol Rawlings	All developments should be required to be zero carbon and should be inspected for this on completion and at set periods after they are in use. Failure to comply should result in the maximum penalties possible, including demolition.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	As ambitious as we can but still be realistic (give factual evidence why low zero carbon standards are possible)
66	Robert Philip Cunliffe	not "ambitious", but rather 100% "dedicated" to achieving zero carbon, or even better standards. Show some real leadership
67	William Mortimer	Be as ambitious as you possibly can be because the country will need elbow room to keep our farmers producing the food we need without having to ship in cargoes by air and sea at vast cost and at the mercy of overseas powers. We should all eat less and this too would improve health as a look at WWII diets and health will surely confirm.
68 (a)	Mark Jopling	New builds will need to be different to conversion of older property. Program to improve efficiency of the Victorian housing stock
68 (b)	Mark Jopling	very on new builds Separate scheme to insulate Victorian Housing stock
70	Melissa Compton-Edwards	Very ambitious.

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

Of respondents who answered the question:

Respondent reference no.	Name / Organisation	Detailed comments
17 said yes, 3 said no and 3 said don't know [15 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to deal with "soil sealing" and degradation. Please see this webpage for details of this issue and how it can be reduced <a href="https://www.recare-hub.eu/soil-threats/sealing">https://www.recare-hub.eu/soil-threats/sealing</a> Need to look at removing tarmac verges and replacing them with grass. maybe stipulate that a new tree has to be planted for each new housing unit – on or off site.
31	Tim Catchpole on behalf of MESS	<a href="#">See above</a>
39	Solomon Green	Yes delay all action for another thirty years to confirm whether the globe is still continuing to warm or whether as the consensus of climate scientists were forecasting as late as the 1970s we were entering into a dangerous climate cooling phase.
40	Jamie Edwards	It's not the top priority
41	Anthony Swan	Solar energy. Turbines at Teddington Lock. Wind turbines.
43	Paul Hart Prieto	Autonomous "uber style" low carbon vehicles for the public to use. Hydrogen based public transport with intelligent routing based on demand Schemes to share new, low carbon heating across residential properties, replant larger woodlands in bushy park and richmond park, mandate all new builds have solar and wind, use waterways to generate heat and electric for the borough, generate an economy of scale for residents with shared purchasing power of greener alternatives etc.
44	Roger Cutler	Stop concreting of front gardens & re-allow rain water to escape.
45	Sally Beeson	I wish that Local Councils weren't overruled by unelected so called experts on local planning issues. The law needs to change to protect our environment from over building, building on protected green spaces and school playgrounds.
46 (a)	Joan Gibson	Further to this LBRuT can run a campaign to get current households to switch lights off, and appliances from standby. No cost to the household and it drastically reduces energy consumption so reducing our impact on the environment whilst saving us money.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Zero carbon as soon as possible for the Council and for all residents, businesses and premises in the Borough. Many benefits economically, for the climate, and socially.
49	Margaret Edwards	When we did major work on a property it was difficult to access information or support on recycling building materials - it was too time consuming to arrange for either us or our builder. I dont know what happens to the contents of most skips but I expect they end up in landfill. Given the amount of renovation underway in the borough this is an area where there needs to be information provided (perhaps at time of planning application etc) and perhaps an incentive to recycle.
50	John O'Brien	Greater use of and encouragement to use solar panels. Emerging technologies can allow tarmac road surfaces to generate power, allow footfall in public spaces to generate power, allow heat pumps to extract power from rivers and we have a big one in the borough. Offer free parking and other advantages to all fully electric vehicles.
52	Winston W Taylor	Not enough time to consider this. It would involve a lot of reading from previous consultations to answer this properly.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Review the WSP Pedestrian and Cycle Bridge Feasibility Study of October 2018 and commission the next stage report. <b>[A copy of the WSP Report was provided, which is available at <a href="https://www.richmond.gov.uk/media/16409/thames_bridge_feasibility_summary.pdf">https://www.richmond.gov.uk/media/16409/thames_bridge_feasibility_summary.pdf</a>]</b>
58	Michael Atkins, Port of London Authority	There must continue to be full support within any future Local Plan for the encouragement of the use of the River Thames for passenger and freight transport through the protection of, improvement to, and provision of new relevant infrastructure including wharves, slipways and piers. In addition, the PLA considers that there must be support must be given to the potential use of existing piers and structures as part of the delivery of small scale

Respondent reference no.	Name / Organisation	Detailed comments
		freight and 'last mile' delivery as well as for the maximisation of use for passengers over the timescales of the Local Plan. This will help to achieve the Borough's sustainable travel goals with regard to improving air quality and decreasing road congestion for local communities.
61	Tom Minns	Expand assistance for apartment blocks to install EV points. They really are the low hanging fruit as you can encourage the move to full electric cars in large numbers.
62	Kathleen Massey	Not Answered
63	Carol Rawlings	No expansion of Heathrow airport. All public and private transport to become carbon neutral. Penalties for non-recycling (as Japan has had for decades). Use of transparent bags where possible so that inappropriate disposal of recyclable items can be easily identified. Food composting to be made obligatory (some flats still don't have the facility to do this).
66	Robert Philip Cunliffe	Engage with the wider Climate change movements to investigate how harnessing with other London boroughs can yield both cost savings and more efficient use of resources
67	William Mortimer	What I understand is that the Council does have a Disaster Management Plan and it is vital to see the Flood Risk elements of this to know whether there is a coherent approach enabling local communities to handle some of the obvious needs. I have previously provided a document suggesting the bare bones of a plan in event of flood or indeed any disaster that renders key local infrastructure useless and the immediate needs for evacuating people from the area. There are two key locations to support the infrastructure for such emergency management by a local team. These are, firstly, the third railway track over the river at Barnes Bridge. The river here was formerly the docking point for the River Police and hence is suitable for the inter-connection of supplies coming by water to the land-based teams working in the area. The second is the building formerly housing the manual signalling activity and point management for the railway lines from Waterloo to Richmond and the loop line via Hounslow . I will send you, upon request, the document I previously provided to LBRuT, which also suggests the sort of materials to be stored on Barnes Bridge in order to support the sustenance and evacuation of local people. The land owned by the railway company where the lines split at Vine Road may also be useful for other Council developments.
<b>Are there any other climate change and/or sustainability issues that you would like the new Local Plan to address?</b>		
29	Richmond Cycling Campaign	P14-17 talks about the climate emergency. We welcome many of the steps proposed here, especially the sustainable urban drainage programme, which has had such beautiful results elsewhere in the country.  While transport is covered elsewhere in the paper, we think more needs to be made of it in this section. Transportation produces 1/3rd of emissions, yet is not covered in detail here. We would like to see commitments, in this context: <ol style="list-style-type: none"> <li>1. For everyone new home and office to have safe and secure bicycle parking for all residents and visitors</li> <li>2. For every home, office or place of interest to be immediately accessible to local people by walking and cycling. This means the borough needs a dense 'mesh' of cyclable routes never more than 200m from each other.</li> <li>3. A requirement on all deliveries in the area to be managed by consolidation hubs, ensuring that 'last mile' fulfilment is never by motor transport unless specific factors make this impossible.</li> <li>4. Removal of all council subsidies for driving - whether this is parking, driving, or the wide range of other activities the council has to undertake because of the damage caused to our built environment by motor vehicles.</li> </ol> Additionally, we'd also like this section to either include or potentially commission research to look at the carbon benefit of the different ways of moving transport choices to walking and cycling over driving.
30	Jon Rowles on behalf of Friends of Heathfield	Need to explicitly include the sustainability "proximity principle" into the local plan Loss of front gardens – new housing units could have legal agreements to stop gardens being lost to hard standing.

Respondent reference no.	Name / Organisation	Detailed comments
	Recreation Ground and Environs	Current guidelines for home extensions encourage traditional pitched roofs – however, could some of these be substituted for green / brown roofs in certain circumstances, such as the back portion. Environmental value of back gardens / back lands both as a habit and as a wildlife corridor is under appreciated. Need to record wildlife corridors and make the various railway tracks SINC's, this will also help prevent the loss of habitats caused by Network Rail selling land adjacent to railway tracks to neighbouring homeowners. Need a spoke of cycle routes leading out of the town centres into their catchment areas. In the past the focus of cycle lanes has been the longer-distance routes linking up towns rather than encouraging people to switch from the car for short journeys within their own town.
31	Tim Catchpole on behalf of MESS	<a href="#">See above</a>
39	Solomon Green	Prepare for the possibility that, as more than 30,000 scientists (including some climate scientists) believe, the so-called consensus is wrong.
40	Jamie Edwards	NO> See above. Utterly mad to make this a top priority.
41	Anthony Swan	Educate and coordinate peoples understanding of what can be recycled, which bin to put it in and what to do with anything that "Can't" be recycled.
42	Jeremy Gill	No
43	Paul Hart Prieto	Look into ground water level management to reduce risk of ground water flooding.
44	Roger Cutler	More re-cycling & less in landfill.
47	Trevor Rowntree	I think that recycling should be compulsory and I am in favour of fines for households/business that do not recycle. Also fly tipping should be fully investigated and punished.
49	Margaret Edwards	All households that put out food and/or garden waste on regular basis should have free compost delivered twice a year. The system for collecting very small free bags of compost did not work - lots of people came by car assuming large bags and so not very sustainable.
51	Su Bonfanti	I am concerned that current practice on Flood Risk Assessments is inadequate: I've looked at a few applications for small scale local development and those are entirely tick box documents which always conclude that a new development, even with a basement, will not increase flood risk to other properties. Water has to go somewhere, and cumulative small scale developments seem likely to undermine the overall direction. Is it possible to provide more information on practical proven solutions, eg for small scale sustainable urban drainage, and to insist on them for all proposals?
52	Winston W Taylor	Again, not enough time.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Possible central combined heat and power plants.
55	Jon Rowles	Many of the new housing units may be zero carbon - but if facilities needed to support them are not close at hand this can create far more carbon - things like food shops, schools etc and all create a lot of journeys.
58	Michael Atkins, Port of London Authority	The PLA recently published its Air Quality Strategy (2018) and is currently developing an update to this in line with government guidance. This strategy, which includes a five year action plan, covering the period 2018 - 2022 must form part of the evidence base as part of the development of the Local Plan.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	None
63	Carol Rawlings	The development plan for Ham should be re-addressed as it would double private car use on very narrow roads, some with 90 degree bends which are already dangerous. It would also lead to pollution issues, and increased incidents of accidents. It would decrease the amount of open space as current green areas around blocks of flats would disappear and the character of Ham Village Green would become urbanised.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Yes: how will we decrease environmental pollution outside of restrictions on new developments? How can we include new rules on developments that are in progress and get them to adapt now? If we only have policies in place for 2024 then it means significant developments over the next 5 years will be developed permanently with low standards in terms of sustainability and addressing climate change. It's an urgent issue that we need to tackle now.
66	Robert Philip Cunliffe	Yes - rising sea levels are a fact, not an imaginary threat. Plans to accommodate a MUCH higher rate of rising than previously planned for need to be explicit NOW

Respondent reference no.	Name / Organisation	Detailed comments
67	William Mortimer	Experience of the current Covid-19 epidemic simply underlines the need for reliable broadband communications and the Disaster Management Plan needs to consider how services will be sustained inf the terrestrial infrastructure has been compromised. Satellite communication offers enormous potential but is limited in the amount of traffic it can handle. there needs to be careful consideration of the services to be accorded priority and the existing infrastructure to be used.
68 (b)	Mark Jopling	Major "offload" multi-modal transport hub just SW of M3 Jn 1. Park and ride for cars coming into Richmond and beyond into Central London from private cars to public transport via SW Trains and Crossrail 2 onto the Shepperton Line.
69	Geoff Bond on behalf of Ham and Petersham Association	Make working from home easier.
70	Melissa Compton-Edwards	<p>As transport is the largest emitter of greenhouse gases, the borough should encourage car-free/car-lite development and advocate and enable a shift in travel behaviours to more sustainable modes of transport: walking, cycling and clean public transport. As per CPRE London's suggestions, the Local Plan should directly reference the borough's transport, air quality and climate emergency action plan targets:</p> <ul style="list-style-type: none"> <li>"- To reduce car trips from 41% of all trips to 25% of all trips</li> <li>- To increase the number of Richmond residents doing at least the 20 minutes of active travel they need to stay healthy each day, from 36% to 70%</li> <li>- For 72% of the population to be 400m from the strategic cycle network (have access to a safe and pleasant cycle network)</li> <li>- To reduce the number of people killed or seriously injured on Richmond's roads from around 70 per year to zero</li> <li>- Additionally to reduce car ownership, traffic volumes and air pollution and to improve bus times, and for more people to be using public transport (targets in TFL's LIP3)."</li> </ul> <p>Agree with Richmond Cycling Campaign that while transport is covered elsewhere in the paper, more needs to be made of it in this section. Would like to see commitments, in this context:</p> <ul style="list-style-type: none"> <li>- For everyone new home and office to have safe and secure bicycle parking for all residents and visitors</li> <li>- For every home, office or place of interest to be immediately accessible to local people by walking and cycling. This means the borough needs a dense 'mesh' of cyclable routes never more than 200m from each other.</li> <li>- A requirement on all deliveries in the area to be managed by consolidation hubs, ensuring that 'last mile' fulfilment is never by motor transport unless specific factors make this impossible.</li> <li>- Removal of all council subsidies for driving and parking - because of the damage caused to our built environment by motor vehicles.</li> </ul> <p>Additionally, I'd also like this section to either include or potentially commission research to look at the carbon benefit of the different ways of moving transport choices to walking and cycling over driving.</p>
<b>Delivering new homes and an affordable borough for all</b>		
<b>Do you agree with the proposed policy directions?</b>		
Of respondents who answered the question: 10 said yes, 9 said no and 6 don't know [13 did not answer the question]		
<b>Do you agree with the proposed policy directions? - If you disagree with any of the policy directions please tell us more here:</b>		
14	Mayor of London	<p><b>Housing</b></p> <p>The Mayor welcomes that Richmond recognises the borough's new housing target for the delivery of 4,110 new homes between 2019 and 2029, as set out in the Intend to Publish London Plan in Table 4.1. The Mayor would like Richmond to aim to exceed this target in line with his spatial strategy through greater delivery of housing from small sites to take account of the shortfall in meeting identified housing need across London. The borough's minimum small sites target for this period is 2,340 homes.</p> <p>With regards to the delivery of small sites, the Panel Report specifically states that the small sites target in the London Plan can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect as required by paragraph 70 of the National Planning Policy Framework of 2019.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>While Richmond's Local Plan needs to consider the National Planning Policy Framework 2019, the Planning Practice Guidance (Paragraph: 013 Reference ID: 2a-013-20190220) is clear that where a spatial development strategy has been prepared by the Mayor, it is for the relevant strategic policy-making authority to distribute the total housing requirement which is then arrived at across the plan area. Richmond's housing target is set out in the London Plan.</p> <p>Beyond 2029, the Plan's proposed housing target should be based on a combination of the figures taken from the SHLAA 2017, local up-to-date evidence of identified capacity and the small sites target, which should be rolled forward in accordance with paragraph 4.1.12 of the Intend to Publish London Plan.</p> <p>The Mayor welcomes Richmond's intention to undertake a Local Housing Needs Assessment but this would be based on the government's standard method. To be clear, Richmond should conduct a Strategic Housing Market Assessment in accordance with paragraph 4.10.5 of the Intend to Publish London Plan so that the borough has an understanding of housing needs in its area including tenures, housing for the elderly and the needs for different sizes of dwellings among others.</p> <p>The Mayor is pleased that Richmond will consider the needs of Gypsies and Travellers in its housing need assessment. Richmond should note that the Mayor intends to lead a London-wide Gypsy and Traveller accommodation needs assessment. It should also note the Secretary of State's Direction on Intend to Publish London Plan Policy H14.</p>
17	Hannah Bridges, Spelthorne Borough Council	<p>In respect of housing, we recognise that this is a strategic and cross boundary issue. Officers acknowledge that like Spelthorne, Richmond is a constrained borough and we face many similar constraints, however every effort should be made to meet its Local Housing Need within the borough boundaries and no stone should be left unturned in determining an appropriate strategy to guide the new Local Plan. We are supportive of the use of up to date evidence to inform the potential options.</p> <p>Richmond should also look to the wider Greater London area to assist meet its housing needs if it is unable to do so alone.</p> <p>Spelthorne Local Plan Officers at Spelthorne are currently in the process of reviewing the representations received to the Preferred Options consultation. We are also undertaking further site assessment work to firm up the site allocations and aim to maximise supply. Whilst Spelthorne intends to meet its housing needs within its Borough Boundaries, our estimates show that we will only just be able to meet our standard method housing need figure. In addition, Planning Practice Guidance sets out that Local Housing Need is a minimum starting point in determining the number of homes needed in an area. If it transpires that Spelthorne is unable to meet its own needs within the Borough, we will need to work with Duty to Cooperate partners in order to explore all options to meet our local housing needs.</p> <p>Following the completion of our further site assessment work we will reflect on our housing position to determine the next steps for our Local Plan, which in turn will inform our Duty to Cooperate discussions with all neighbouring authorities moving forward.</p> <p>Spelthorne Borough Council looks forward to continuing its engagement with LB Richmond through its Local Plan process. Officers in the Strategic Planning team are available to discuss any of the comments above should this be useful.</p> <p>Please note that this response is at officer level and as such, Spelthorne Borough Council reserves the right to raise any further issues during the preparation of the LB Richmond Local Plan if Members of the Council wish to do so.</p>
18	Phoebe Juggins, Department for Education	<p>4. DfE notes that significant growth in housing stock is expected in London Borough of Richmond upon Thames ('LBRuT'); the draft London Plan (2019) sets a housing target of at least 811 homes per annum (an increase from the current adopted London Plan target of 315 homes per annum), albeit the London Plan is likely subject to modification prior to adoption and the target has yet to be finalised. This likely growth requirement will place pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.</p>
19	DP9 Ltd on behalf of London Square Developments	<p><a href="#">See also comments by respondent in section on the economy.</a></p>
20	Gary Backler, Friends of the River Crane Environment.	<p>FORCE notes the strength of the commitment that "The new Local Plan must include policies that maximise delivery of new housing." A similar level of commitment should be given to increasing the delivery of green spaces that will match the increases in the residential population that the increased housing will bring. This document is silent on the need to provide open space in step with the provision of increased residential housing. It is also silent on the need to provide space for children in the</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>new homes to play healthily and safely. We have already seen large-scale housing developments in the Crane valley with inadequate play facilities. These developments throw the burden of children’s play generated by the new developments onto existing public spaces, which have then become over-used and degraded.</p> <p>Both the quantum and quality of green spaces need to be increased in step with increased housing provision, to avoid increased wear, tear and degradation of existing green spaces, and to support the physical and mental health and wellbeing of the residents which the borough is seeking to accommodate. Moreover, the green spaces need to remain accessible to the public free of charges, in order to be genuinely inclusive and to address “equality impacts” of housing development in the borough (p8).</p> <p>FORCE notes the pressure to increase the height of residential buildings. We are committed to protecting the vista in the Borough’s open spaces: much of the mental health benefit of open space derives from the sense of tranquillity and escape from urban pressures that the open space provides. This tranquillity and escape is compromised by the visual intrusion of structures, including residential housing blocks that are visible from the open spaces, particularly during the winter months of leaf-drop. FORCE also believes that any “view premium” should be a public benefit, available, through the absence of visual intrusion, to all users of the open space, rather than a private benefit accruing to the property developer through the premium pricing of housing units that enjoy open-space or river views.</p> <p>Moreover, many of our open spaces provide “dark spaces” for wildlife, and form links in “dark corridors” which are a crucial element in the well-being and biodiversity of species in the Borough. These dark spaces risk being compromised by lighting and traffic from housing developments adjacent to them.</p> <p>Accordingly, FORCE will oppose any residential increase in the height of residential buildings that would be visible from the Borough’s open spaces, and in particular any residential development that compromised the vista and the darkness of the river corridors and open spaces in the Borough. We would expect the protection for these dark corridors to be a part of the plan.</p>
21	Lucy Wakelin, Transport for London Commercial Development	<p>Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory role as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.</p> <p><b>Delivering new homes and an affordable borough for all</b></p> <p>TfL CD broadly supports Richmond’s approach towards delivering new and affordable housing across the borough. TfL CD is committed to delivering 50% affordable housing (by habitable room) across its portfolio as instructed by the Mayor and look forward to working with the Council to achieve this on TfL owned sites. We also welcome the Councils acknowledgement of Build to Rent (BtR) as a new and innovative approach to development which can increase capacity and speed up housing delivery. TfL CD has a number of active BtR schemes across London looking to deliver significant residential-led development and we welcome the opportunity to explore the potential for this on TfL owned sites within Richmond.</p>
22	Jimmy Wallace, Richmond Athletic Association	<p>We broadly support the borough’s proposed approach to providing the homes that its residents require. We also welcome the borough’s intention to prepare a Local Plan that will be in accordance with the housing needs for Richmond as outlined in the emerging London Plan and also the acknowledgment of Government’s long term objective to deliver a higher housing target. We support the commitment to undertake a Local Housing Needs Assessment in 2020 / 2021 and the intention to meet a full range of housing needs and ‘to consider opportunities to make efficient use of every piece of land to maximise the delivery of new housing’. A series of policy directions for formulating the emerging housing policies are identified and we broadly support the suggested approach.</p>
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<p>We note the current London Plan target for the Borough is a minimum of 315 new homes per annum. The new London Plan is held up for adoption by a dispute between the London Mayor and Government on the target for new homes across London. The Borough outcome could be a minimum of 411 or as high as 811 new homes per year.</p> <p>We are not in support of existing Green Belt or MOL being used for new homes but we are not opposed in principle to adaptations or enhancements to existing buildings in parks and MOL.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>We note that Friars Lane Car-park, just off the Green, is identified by the current Local Plan as providing potential for housing. We would wish to comment should any proposal materialise (previous proposals have failed). We would wish to ensure that the Green is not expected to replace the lost car-parking capacity and that better use is made of other existing car-parks in Richmond in this eventuality.</p> <p>We would like to see Richmond car-parks (some under-utilised) reduce parking around the Green.</p> <p>We expect there to be increasing use of Central Richmond for residential use, especially above ground floor retail and other uses. Adaptation though may be difficult given the historic nature of many of the buildings. It may be worthwhile developing specific policies to return buildings to their original all residential use (with careful reference to historic photographs, etc.) especially in the non-core area such as Hill Rise/Richmond Hill where there is photographic evidence of how these buildings once looked as residences before shops were added in the 20th century. We urge there to be evidence prepared to help assess the balance in Central Richmond between residential, retail and office use.</p> <p>The character and heritage of the area concerned is important and we would not wish to see an increase in density of accommodation or any large-size development or increase above the height of existing buildings to provide new homes.</p> <p>We cannot be more precise without evidence of the number of homes needed and their allocation across the Borough.</p> <p>We believe the policies in the current Local Plan cover these issues adequately and if further amplification is required we would suggest that it could be dealt with by subsidiary planning tools.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>Need to analyse the amount of latent demand better, for example how many houses sharers would prefer to rent one-bedroom flats?</p> <p>The council should be looking to see if some joint developments can be done in the Kingston and Hounslow opportunity areas so that people on the housing register can be accommodated more quickly. NPPF states that neighbouring authorities need to co-operate and met unmet demand if possible.</p> <p>Need to explore 'Discount Market Sales' – where a discount is given against the market rate, and this discount is passed onto all subsequent purchasers. These schemes also result in a more favourable mortgage interest rates compared to shared ownership.</p> <p>The 'gap in the middle' needs to be addressed – currently only the very well off or those on benefits can access secure housing.</p> <p>More alms-houses could be built so that affordable retirement flats are available in perpetuity.</p>
32	Mark Jopling on behalf of UPPFT	See also comments below
34	DP9 Ltd on behalf of Harlequin Football Club Limited	<p><b>3. Housing Need</b></p> <p>3.1 The Local Plan Direction of Travel Consultation document identifies housing delivery and meeting the housing targets set out in the London Plan as one the key reasons why a new Local Plan is required.</p> <p>3.2 The Intend to Publish version of the London Plan (December 2019) provided Richmond with a new housing target which was substantially higher than the target set out in the adopted London Plan. The ten-year delivery target for the period from 2019/20 to 2028/29 is 6,440 new homes, which equates to 644 units per annum. The Direction of Travel Consultation document states that 315 new homes per annum will be delivered in the borough between 2015 and 2025, which highlights a major shortfall.</p> <p>3.3 To compound this particular issue, publication of the Local Plan Direction of Travel Consultation has been followed by a letter from the Secretary of State for Housing, Communities and Local Government to the Mayor of London, directing him to make changes to the new draft London Plan before it can be adopted. A relevant extract from the letter states:</p> <p><i>"I had expected you to set the framework for a step change in housing delivery, paving the way for further increases given the next London Plan will need to assess housing need by using the Local Housing Need methodology. This has not materialised, as you have not taken the tough choices necessary to bring enough land into the system to build the homes needed."</i></p> <p>3.4 Taking account of the above, one can expect that housing targets for individual boroughs will further increase in the short term. Through the new local plan process, it is therefore imperative that the Council seeks to promote the consolidation and intensification of large underutilised sites in the borough and targets the least constrained sites for higher density development. It is our strong view that redevelopment of the Harlequin's site and the Twickenham Central Depot site can make a significant contribution to achieving these targets, whilst at the same time easing the pressure on other more sensitive parts of the borough.</p> <p>3.5 As suggested in the Direction of Travel consultation document, we support the undertaking of a borough wide Urban Design Study as a tool to help identify redevelopment opportunity sites and quantify the appropriate scale of development on individual sites.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<b>[See respondent no. 34 in the Call for Sites Responses Schedule]</b>
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	Housing delivery should follow London Plan Good Growth by Design 'This means new development should benefit everyone who lives here. As such, it should be sensitive to the local context. It should also be environmentally sustainable and physically accessible.' <sup>6</sup> This is particularly relevant in Ham and Petersham which has limited accessibility and low PTAL. Reference: <sup>6</sup> The Mayor of London (2019) <i>London Plan</i> Available at: <a href="https://www.london.gov.uk/what-we-do/regeneration/advice-and-guidance/about-good-growth-design">https://www.london.gov.uk/what-we-do/regeneration/advice-and-guidance/about-good-growth-design</a> (Accessed 29 March 2020).
40	Jamie Edwards	We don't need more people in the borough. London is overpopulated as it is. Getting on a train at Twickenham or Richmond in rush hour is nearly impossible. Why are we cramming more people into the borough?
41	Anthony Swan	Richmond borough will never be affordable. Reverse Thatcher policy and build / convert more Council houses for rent. Than rents can be selective and affordable. eg Nurses, new School teachers etc get cheap rate.
42	Jeremy Gill	Percentage of affordable homes in your target is too low. Also I do not agree with providing more homes for families. There is a lack of suitable housing for single person households who make up a far large percentage of the households in this country. Of the 27.6 million households in this country, 8 million are single person households. Families by their very nature benefit from the economies of scale inherent in multiple person households.
46 (a)	Joan Gibson	411 new homes a year is not a lot – considering you have Stagg Brewery, Twickenham Town centre and Kneller Hall sites on the books. I do think LBRuT is good at ensuring new housing delivers good room sizes, a good area to live in, with outdoor space and facilities for families. I support your objective of ensuring land is used efficiently and would like it extended to infrastructure i.e. it is much more efficient and environmentally friendly to expand schools rather than build completely new schools. Brown field sites are guaranteed and sports facilities already exist so you are not reducing biodiversity by creating carbon expensive grass mono-cultures for school sports.
47	Trevor Rowntree	I think the borough is over populated as it is and we cannot afford to build any new homes.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	We should promote walking, public transport and cycling, and stop use of cars and vehicles across the Borough. We should not provide parking spaces for new and renovated housing. We should heavily increase parking charges for residents and businesses.
49	Margaret Edwards	The need for specialist housing for older people, such as extra care has been ignored. Opportunities have been missed e.g. Brewery lane, Lidl developments in East Twick and on Wickes site, all ideal locations and all used for standard homes or shops. So called 'retirement housing' such as one on Twickenham Green have inaccessible bathrooms and no communal facilities. If people under occupying large homes can move to accessible well designed apartments then the former are freed up for families.
50	John O'Brien	Build council houses
52	Winston W Taylor	Broadly agree with the tenor of the document but I am not sure that this section sets out a real policy direction. The answers to the questions posed seem to me to give a policy direction. The paper does not give any direction - except to do what the Mayor of London says re Housing targets
55	Jon Rowles	The housing targets are too high and will result in a lot of inappropriate development.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We support the proposed policy directions. It is important for the borough and East Twickenham to offer a range of housing for a range of household types.. We support retaining 50% affordable target on all developments. Small sites are an essential component but especially important that development respects existing style. One person households should be included in addition to the suggested groups (they represent 29% of total households, and are likely to grow).
66	Robert Philip Cunliffe	Growth plans need to be revised in line with more aggressive climate change models; for both affordability and impact
67	William Mortimer	I regret I am out of time to think any further on these matters before the deadline for submission and they are not an area in which I have expertise. I have focused on the items needing further attention, namely: 1. the use of the river for its historic purpose of moving people and materials safely and reliably 2. the preparations that should be undertaken under local authority to ready every area for disasters of various kinds, e.g flooding, aircraft crashes and dirty bombs (viral or nuclear).

Respondent reference no.	Name / Organisation	Detailed comments
68 (a)	Mark Jopling	CIL payments for C2 and C3 should be same level to stop speculators trying to exploit arbitrary differences to maximise margins and avoid building genuine affordable housing to meet local needs.
<b>What do you think are priorities for the type and size of new dwellings?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The council need to be careful not to just concentrate on the needs of the housing register. Many young adults have problems accessing the housing market because of the low number of starter homes and studios are being built, as developers now favour the demands of buy-to-let landlords. Whilst most single people don't show up on the housing register – and this could result in demand for family housing being more pronounced that it actually is.
28	Alice Shackleton on behalf of The Kew Society	There must be a range of one – three bedroom flats as well as houses, so that young people, families and older residents are part of a mixed community that is alive. The current trend to blocks of small flats risks creating “ghetto” areas appealing to and aimed at younger residents who commute to work and have less involvement in the local community. Green space with the dwellings is a priority.
31	Tim Catchpole on behalf of MESS	We await results of the Housing Needs Assessment Study.
40	Jamie Edwards	no more please!
41	Anthony Swan	If we want families living here then you need more than one bedroom. Council and Housing trusts should concentrate on 1, 2, 3 bed flats to rent...maybe to sharers, The buyers of larger houses can look after themselves.
42	Jeremy Gill	Small homes in houses, not flats. Blocks of flats overload local infrastructure.
44	Roger Cutler	Flats.
45	Sally Beeson	As housing is costly in our borough, families are living in very small flats even though they may have several children - we're going backwards to Victorian overcrowding. I think there should therefore be fewer units built, but larger inside.
46 (a)	Joan Gibson	You have left Social housing building out of your list of building homes. This should be included as lack of social housing, high rents and insecurity around term of rent is making the rental market difficult, and leading to mental health issues and homelessness. This would also help your very low level of affordable housing – 17%. There are too many excuses as to why your affordable housing is so low – this needs to stop.  You apparently cannot find sites for the housing, so giving what you have to self-build is surely a bad idea. I like your ideas of exploring modern pre-fab buildings.
47	Trevor Rowntree	No new dwellings.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
49	Margaret Edwards	See above re extra care housing. Plus all new homes should be fully accessible, meeting at least M4 (2) with 40% meeting M4 (3) Building Regs.
51	Su Bonfanti	It is important for the borough and East Twickenham to offer a range of housing for a range of household types. Strongly support retaining 50% affordable target on all developments. Where I live in East Twickenham, the only site are small sites in already densely built areas. For neighbours to welcome such developments, it's especially important that they respects the existing scale and style. That need not prevent modern interpretations but they must be in the right place. Recently there was a proposal - rightly in my view rejected - to build a two bedroomed house with underground living area at the end of Alexandra Road. The idea was innovative and could work - in the right place. But the land currently occupied by two garages and a bit of parking in a network of late Victorian/Edwardian redbrick terraces is not the right place.
52	Winston W Taylor	I dont think anybody really knows the answer. The survey of Housing need is a major priority. I have a feeling that there is a need for 3/4 bed family houses as the developments in recent years seem to have been mainly of flats for singles and childless couples.
62	Richard Woolf on behalf of McDaniel Woolf Architects	Acknowledge that larger scale dwelling have always been a part of Richmonds history, as well as smaller more typical dwellings.
55	Jon Rowles	These seem to be based upon the housing register and not the broader needs of the entire population of the borough

Respondent reference no.	Name / Organisation	Detailed comments
56	Rob Kennedy, Environment Agency	2-3 bedroom flats and houses.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	The priorities for the type and size of new dwellings are genuinely affordable family homes for rent and homeownership for working residents on low to middle income.
63	Carol Rawlings	No additional dwellings required as have already met the target. Any new ones should be social housing only, as there is a severe shortage. No new luxury dwellings of any size should be allowed.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	This should be guided by facts and growing trends.
66	Robert Philip Cunliffe	Zero carbon footprint
68 (a)	Mark Jopling	Be strict with the tenure mix of affordable housing. Some developers driven by exploiting the different definitions of affordable housing and relying on Councils having a lack of resourcing for enforcement. Council must also have stricter enforcement of Planning Conditions and s106 agreements.
68 (b)	Mark Jopling	Proper tenure mix of affordable housing. Eliminate difference in CIL for C2 and C3 to stop speculators being incentivised to pretend to deliver a certain type of housing for which demand is limited. Greater enforcement of s106 and Planning Conditions so the community gets guaranteed delivery of what is committed in Planning Applications
<b>Could other forms of housing assist with meeting local needs?</b>		
Of respondents who answered the question: 12 said yes, 3 said no and 6 said don't know [17 did not answer the question]		
28	Alice Shackleton on behalf of The Kew Society	A relatively recent form of housing, co-working, is an imaginative concept that provides bedrooms for young adults to rent, having communal work/living space and garden space. That could provide affordable, well-designed living in the borough where such residents might struggle to buy. It could give them a transition time between, say, college, establishing their work and perhaps buying a property, thus fulfilling a need for somewhere affordable for people to live in this expensive borough.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	If there were more student halls of residents built – it would free up many flats and houses the students now occupy. Need to give consideration of the needs of homeless people – we have very limited supported housing for homeless people. Maybe a need for accommodation on the YMCA hostel model to reduce the large sums paid for emergency bed and breakfast accommodation – as suggested in the 2012 DTZ Evidence Base for Tenancy Strategy (paragraph 127 and 140) <a href="https://www.richmond.gov.uk/media/11322/dtz_full_report.pdf">https://www.richmond.gov.uk/media/11322/dtz_full_report.pdf</a> The alms-houses model would mean we have a permanent supply of assisted housing for older people. It would also encourage more people to downsize which would free up more family sized units.
31	Tim Catchpole on behalf of MESS	We await results of the Housing Needs Assessment Study.
41	Anthony Swan	Council houses and to rent properties.
45	Sally Beeson	Empty shops or unused buildings near to the town centres.
46 (a)	Joan Gibson	Social Housing
49	Margaret Edwards	Home sharing between people with support needs and people with housing needs, land allocated for intergenerational housing with space , support for co-housing schemes - be a pioneering borough as only one other in whole of London.
50	John O'Brien	Council houses
52	Winston W Taylor	See 27.

Respondent reference no.	Name / Organisation	Detailed comments
62	Richard Woolf on behalf of McDaniel Woolf Architects	Higher density dwellings new transportations hubs.
55	Jon Rowles	<ul style="list-style-type: none"> <li>- More student housing - in the form of halls of residence - could free up a lot of houses and flats in the borough.</li> <li>- Might be a need for supported housing for homeless people, young people having to move out of abusive homes. In the form of a YMCA hostel etc</li> <li>- more starter home being built rather than two double bedroom flats targeted at buy-2-let landlords.</li> <li>- Need to explore 'Discount Market Sales' – where a discount is given against the market rate, and this discount is passed onto all subsequent purchasers. These schemes also result in more favourable mortgage interest rates compared to shared ownership.</li> <li>-The 'gap in the middle' needs to be addressed – currently only the very well off or those on benefits can access secure housing.</li> </ul>
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Community-led housing and self- and custom-build. Offsite manufactured homes can also contribute to meeting local needs.
63	Carol Rawlings	Social housing; shared housing.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	If new developments are not possible, areas to consider would be residential areas on main roads. Because of the high level of disturbance on these roads, these don't currently make the best permanent homes. However since there's an objective to reduce environmental pollution, these could be a future opportunity. Because of online shops, shops on high streets are becoming empty. If there's a clear policy to keep a minimum of quality shops, the empty sites could become residential.
<b>Would you support housing delivery from small sites, if it is of good design and contributes to local infrastructure?</b>		
Of respondents who answered the question: 19 said yes, 4 said no and 2 don't know [13 did not answer the question]		
28	Alice Shackleton on behalf of The Kew Society	Yes, as long as tall buildings are not sited on such small sites – there should be a maximum limit on height and density.
<b>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?</b>		
14	Mayor of London	<p><b>Affordable Housing</b></p> <p>The Mayor welcomes Richmond's intention to seek 50% affordable housing from residential development. However, the Mayor has set out a Threshold Approach to affordable housing delivery in Policy H5 of the Intend to Publish London Plan and this should be reflected in Richmond's emerging Local Plan. The Threshold Approach seeks to limit those circumstances where viability evidence is required as part of residential planning proposals by providing the incentive for developers to achieve at least the minimum level of affordable housing to qualify for the Fast Track Route thereby avoiding scrutiny of viability at various stages of development. The Regulation 18 version of the Local Plan should be drafted in line with this approach.</p> <p>It is noted that the Inspector for Richmond's adopted Local Plan found that Richmond's Whole Plan Viability Assessment identified the potential for some sites in Richmond to realise proportions of affordable housing approaching 50%. Therefore, should Richmond wish to set a threshold higher than 35%, this should be evidenced through its viability evidence, including how the threshold will incentivise housing and affordable housing delivery.</p>
17	Hannah Bridges, Spelthorne Borough Council	Given the lack of affordability within the area affordable housing provision should be prioritised within the new Plan. The Local Plan should distinguish between brownfield and greenfield sites in determining its affordable housing provision given that greenfield land generally has lower associated development costs.
19	DP9 Ltd on behalf of London Square Developments	<p><b>Affordable housing – p. 20</b></p> <p>The Direction of Travel document acknowledges a shortfall in delivery of affordable housing. Richmond will need to consider further opportunities, including the Site, to deliver affordable housing. The Greggs application seeks to maximise the affordable housing provision and it is proposed to deliver circa 57 units as affordable</p>

Respondent reference no.	Name / Organisation	Detailed comments
		(49% of total units) on site. The former Greggs Bakery Site offers a unique opportunity to deliver a high proportion of affordable units on site including a mix of unit sizes and family homes.
22	Jimmy Wallace, Richmond Athletic Association	<p>The borough's initial assessment of its affordable housing requirements and the suggested policy directions to address these are acknowledged and broadly supported. However, in the spirit of positive planning as outlined in the overall approach to preparing the Local Plan, we do think that the borough should be seeking to develop policies that are taking a transparent and robust approach to <i>understanding</i> as opposed to <i>challenging</i> viability evidence to maximise delivery. In this regard, there is a requirement for the borough work collaboratively with all partners including the Mayor of London, housing associations, developers etc. to work towards delivering the best affordable housing outcomes in the context of a robust but pragmatic discussion around the overall viability of development projects and the many competing interests.</p> <p>In this regard, there may be cases (albeit rare) where a particular development is required to prioritise the delivery of other forms of social infrastructure (e.g. enhanced sports and community facilities) over-achieving the target percentage of affordable housing as identified in policy. Taking a pragmatic approach to such forms of development is likely to deliver the optimum outcome for the borough in terms of the delivery of both affordable housing and other forms of vital social and community infrastructure.</p>
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	We recognise the need for affordable housing in the community given the high property-values and need to have an inclusive community. We encourage key worker accommodation and consideration being given to provision for police accommodation in Richmond given the need for policing of the evening economy and healthcare worker accommodation on account of a relatively high proportion of elderly residents in the area.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>There are models where the discount is maintained in perpetuity; discount Market dales, restriction on staircasing etc. Adopting these methods would see more recycling of affordable housing.</p> <p>Richmond Housing Partnerships (RHP) own a lot of blocks of flats built in the garden city style with pitches roofs. Though most of the flats have been sold on freehold, the roof spaces will still belong to RHP and could be converted into flats. The land by the side of the blocks of flats is likely to be under their control too – and there may be room room to build units there too.</p> <p>Some of the older London County Council style blocks of flats could have their roof space converted into new units. Such developments are common in the private sector and the council need to check to see if RHP still own these roof spaces.</p> <p><b>[See photo in Appendix]</b></p> <p>The council could also take a radical approach and start building new council housing directly or set up their own property company. Councils that have previous transferred their housing stock can set up a new Housing Revenue Account and this is easier now that Theresa May's Government abolished the debt cap. See <a href="https://www.socialhousing.co.uk/comment/comment/reopening-the-housing-revenue-account--is-it-actually-an-option-63624">https://www.socialhousing.co.uk/comment/comment/reopening-the-housing-revenue-account--is-it-actually-an-option-63624</a></p>
28	Alice Shackleton on behalf of The Kew Society	<a href="#">See answer to question above in relation to co-working.</a>
31	Tim Catchpole on behalf of MESS	More priority should be given to affordable housing than to payment of CIL.
40	Jamie Edwards	What benefits? I only see problems with Parking. Overcrowding of swimming pools. Trains etc.
41	Anthony Swan	Renting by Council as above.
42	Jeremy Gill	Compulsory purchasing of properties empty for two years or more.
44	Roger Cutler	Better planning & consideration for surrounding residents.
46 (a)	Joan Gibson	Sites can be rebuilt to provide more efficient use – especially council owned sites. i.e. rebuild Whitton Community centre which is old and inefficient and have flats above it. Fixes the carbon footprint of the community centre whilst giving you some houses with access to infrastructure, green land and good transport links. Rebuild nursery on Whitton Corner in the same manner. Build flats over Sainsbury St. Clares, Homebase and McDonalds (both shops and carparks – carparks can be underground), build flats over Tesco Rugby Road (both shop and carpark), you can do the same with business parks .... The list is endless.
52	Winston W Taylor	I am not an expert on housing finance. I would need to talk to one to answer this

Respondent reference no.	Name / Organisation	Detailed comments
53	Richard Woolf on behalf of McDaniel Woolf Architects	Get Richmond Housing Partnership to review land use, intensification and replacement over a 10 year strategy.
55	Jon Rowles	If you managed to get the government to change the Broad Market Rent Areas - people on housing benefit may be able to access more housing options. There is also this toolkit from the Community Led Homes which has a variety of measures the council can take, including restricting 'staircasing' so the housing association can buy back more housing. <a href="http://clhtoolkit.org/housing/how-ensure-community-led-housing-schemes-are-genuinely-affordable-and-remain-so-perpetuity">http://clhtoolkit.org/housing/how-ensure-community-led-housing-schemes-are-genuinely-affordable-and-remain-so-perpetuity</a>
56	Rob Kennedy, Environment Agency	The use of brown field sites for new housing.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Making efficient use of land whilst it is awaiting long-term development for meanwhile housing.
63	Carol Rawlings	Prefabricated building is cheap, quick to build, and can be carbon neutral. This is the commonest form of private housing in Japan.
<b>General comments relating to this topic area</b>		
32	Mark Jopling on behalf of UPPFT	The Trust makes the following comments on the "Direction of Travel": Eliminate delta in CIL between C2 and C3 to prevent developers being incentivized to deliver profit maximising tenures not based on social need.
<b>Shaping and supporting our town and local centres as they adapt to changes in the way we shop</b>		
<b>Do you agree with the proposed policy directions?</b>		
Of respondents who answered the question: 15 said yes, 3 said no and 5 don't know [15 did not answer the question]		
29	Richmond Cycling Campaign	P22-27 local town centres We want to support local town centres and all the things people choose to do there. However, they're invariably places of high pollution (like Richmond's George St.), and of high perceived danger for those walking and cycling.  However, we think any long term vision for the borough needs to put people back into the town centres, and cars at the periphery. None of our town centres should be a place to 'drive through', nor should their space be so dominated by provision for motor vehicles. We think successful town centres are pedestrianised where at all possible, and they support frequent, smaller shopping journeys - and the borough, as part of this strategy, should be discouraging or closing 'out-of-town' style shopping centres built around large car parks.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The council needs to recognise the value of storage to retailers as it cuts down on frequent deliveries and enables the unit to appeal to a broader range of tenants. There is a value in units remaining as large as possible as hiving off parts for housing at the rear reduces the flexibility of the building and means it appeals to fewer potential tenants. Service yards are important too – those in good condition attract good tenants and enable efficient deliveries. When they are blocked by parked cars, or the service areas built over, deliveries then have to be made by from the main road and these result in extra delivery costs. If the they become squalid – with rubbish not bins not managed properly etc they can put off new tenants and this can affect the viability of town centres.
31	Tim Catchpole on behalf of MESS	Yes, but there is no mention of retail parks.
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	HPNF support the strategic aim to develop a self-sustaining borough where shops, services and employment are available locally and the contribution that this makes to community cohesion and reduction in travel. This aligns with Ham and Petersham Neighbourhood Plan (HPNP)2 objectives for Travel and Streets (section 4.1), Community Facilities (Section 5.1), Retail and Local Services (Section 6.1) and the Opportunities for Change section for Ham Parade (Policy O1) and St Richard's Square (Policy O2). This approach, also described as the '20 minute neighbourhood' is being developed and implemented by Melbourne city planning departments, Victoria, Australia <sup>3</sup> and is also in the latest Sustrans Manifesto <sup>4</sup> .

Respondent reference no.	Name / Organisation	Detailed comments
		<p>'Adapt to changes' suggests a reactive approach to change which could be complimented by a more proactive approach which aligns with the '20 minute neighbourhood'.</p> <ul style="list-style-type: none"> <li>• Policy for neighbourhood centres should consider the use of local development orders relaxing use class controls so as to allow any street level use which includes an active frontage and does not involve conflict (following "Bad Neighbour" definition)</li> <li>• Policy for local/neighbourhood centres should encourage the upgrade of the pedestrian environment to include landscape, surfaces, access, cycle parking etc., in line with Healthy Streets objectives, as documented in HPNP proposals for Ham Parade and St Richards Square in the Opportunities for Change section for Ham Parade (Policy O1) and St Richard's Square (Policy O2).</li> <li>• Other thoughts include: <ul style="list-style-type: none"> <li>○ Support for local centres and local traders with a shared management support and accountancy, website design / graphic design package.</li> <li>○ Supporting community shops / markets with zero rates and access to funding</li> <li>○ Provision of (franchised?) delivery cargo bike scheme for local shops to residents</li> <li>○ Improvement of infrastructure for sustainable transport to reach shopping areas.</li> </ul> </li> </ul> <p>References:  <sup>3</sup> London Borough of Richmond upon Thames Climate Change and Sustainability Strategy (2019) Available at: <a href="https://www.richmond.gov.uk/media/17738/climate_change_and_sustainability_strategy_2019_2024.pdf">https://www.richmond.gov.uk/media/17738/climate_change_and_sustainability_strategy_2019_2024.pdf</a> (Accessed: 29 March 2020).  <sup>4</sup> Victoria State Government (2020) 20-minute neighbourhoods. Available at: <a href="https://www.planning.vic.gov.au/policy-and-strategy/planning-for-melbourne/plan-melbourne/20-minute-neighbourhoods">https://www.planning.vic.gov.au/policy-and-strategy/planning-for-melbourne/plan-melbourne/20-minute-neighbourhoods</a> (Accessed: 29 March 2020)</p>
41	Anthony Swan	What is the Policy? Shaping and Supporting are just words without any proposed actions. Too many shops are charity outlets so should not count as commercial premises.
42	Jeremy Gill	Your policy does not appear to have any direction. The above document, as with most of what you present here is unreadable and meaningless. It conveys almost no tangible information about the subject it purports to cover.
44	Roger Cutler	Vacancy levels are still too high.
46 (a)	Joan Gibson	Agree with most of this – however would like to see business premises at the bottom of flats considered. i.e. Powdermill Lane new development has retail units at the bottom, but these shops are not used that much and ownership changes frequently. It would be better if it was business space attracting jobs into the area.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	We should promote walking, public transport and cycling, and stop use of cars and vehicles across the Borough.
52	Winston W Taylor	Broadly yes but..... I am sure it will be dealt with below
63	Carol Rawlings	I can't read the policy direction. Where is it? There is no link that I can use. Whatever the current direction may be, it needs to be on hold until the full effects of the current virus lockdown can be evaluated.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We think the hierarchy of centres is still useful and that think East Twickenham is correctly classed as a local centre, i.e. not suitable for the biggest stores or for the night-time economy, but intended to provide for largely local needs, including through specialist shops. We don't want to lose retail space, but we support flexibility of use to allow businesses to change how they work and to allow businesses to share space if they think their offerings are compatible. Similarly, it would be good to have more flexibility around conversion to housing. We would like to retain the feeling of a local centre but equally we don't want a permanent array of vacant shops. One approach would be for certain locations to be amenable to conversion eg at the ends of the run of shop frontage in East Twickenham, on the corner of Rosslyn Road or under Poplar Court, where the loss of retail would not change the character of the local centre.
66	Robert Philip Cunliffe	THIS REALLY NEEDS TO BE REWORKED WITH THE IMPACTS of COVID-19, as well as the now dramatic move away from the concept of a "shopping - based" view of urban centres, and the significant shift to web based delivery of good and services. A new model will suggest new business opportunities, in a sustainable way.
68 (a)	Mark Jopling	Per earlier answers - redevelop Big Box parks and space over transport hubs Protect our village High Streets
<b>Do you agree with the spatial strategy proposed?</b>		
Of respondents who answered the question: 12 said yes, 5 said no and 5 don't know		

Respondent reference no.	Name / Organisation	Detailed comments
[16 did not answer the question]		
22	Jimmy Wallace, Richmond Athletic Association	We support the borough's broad approach to its town centre and retail policies. We support the potential policy direction that would encourage more housing in centres to help meet housing need. However, we think that it should also be recognised that additional housing should also be supported in the residential hinterland locations that surround the borough's town centres such as Richmond. This would not alone increase housing supply but will also potentially continue to encourage further vitality on the edges of town centres where a growing residential population will require greater access to retail and other town centre uses.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The problem with the centre hierarchy is that Whitton and Teddington are closer to being small towns, whilst Twickenham and Richmond are larger almost touching metropolitan centres. It would be very difficult for Whitton to accommodate major development – other than the Telephone Exchange site that is unlikely to come to market. Catchment areas for each centre should be defined, as they don't necessarily follow ward boundaries (i.e. a large part of West Twickenham is part of St Augustine's Whitton Parish – and many residents there shop in Whitton and commute from Whitton Station).
28	Alice Shackleton on behalf of The Kew Society	Major developments of retail space should be located in Richmond and Twickenham rather than spread out amongst other centres. This allows a mix of size of development appropriate to each centre, including, of course, other shopping centres as presently designated.
31	Tim Catchpole on behalf of MESS	<a href="#">As above</a> . Yes, but again there is no mention of retail parks.
39	Solomon Green	If traffic is to be reduced or kept to present levels it is desirable that major developments be spread more evenly.
40	Jamie Edwards	LOL. We don't need more retail floor space. Have you actually walked down Twickenham High street recently. Empty units and charity shops! Why on earth in a digital economy are you suggesting more retail space? Bonkers.
41	Anthony Swan	Developments or any sort should be encouraged anywhere an entrepreneur wants to be situated. eg if an office needs parking space then provide it as best possible. Major developments have already gone to Kingston. Richmond, Twickenham (apart Waitrose) and Teddington are the bars and coffee shop areas of the Borough. Encourage the river side with hire boats. Don't Tax new startups or existing businesses too heavily. Make parking available where possible. Encourage near stations.
42	Jeremy Gill	Obviously.....
44	Roger Cutler	Should be spread equally.
45	Sally Beeson	I think Twickenham has more space to play with, but as precedence has now been given to a high rise building at the station, I am worried that more could be built. Where I live in Teddington, I can't see where more development can come. Elleray Hall has already been designated a prime site.
46 (a)	Joan Gibson	You are providing too much retail space in general - retail is reducing. The space should be used for small flexible business, and community instead. Major development should be spread around all areas.
49	Margaret Edwards	All five town centres need good range of shops and services. Im not sure how sustainable this is as I note that Twickenham and Richmond have more empty shops in recent years and quite a few businesses that do not survive. Twickenham seems able to support thriving small shops - fruit/veg, bakers, butchers alongside Waitrose but large low cost supermarkets would be a threat to this.
52	Winston W Taylor	Teddington has plenty of retail floorspace. Not sure about the other town centres but the further work proposed should establish this. Dont think Twickenham needs any more retail floorspace - subject to the proposed riverside development - which could change everything
55	Jon Rowles	The majority of new floorspace should be directed towards Twickenham and Richmond as these are closer to metropolitan centres than any of the others. There would also be a benefit from these two towns having more floor space - in that more services/retail would be offered locally resulting in fewer trips to neighbouring Kingston or Hounslow.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Major development should not be encouraged equally amongst the five town centres. Rather the location of major development should take account of the role and position of the town centre in the town centre hierarchy network.
61	Tom Minns	Focus on Major centres
63	Carol Rawlings	I can't read the strategy as I have no link to it. Why am I being asked questions about things I cannot read about? Major developments must be kept on hold until the effects of the current crisis are fully known. It is absurd to propose a plan at this stage.

Respondent reference no.	Name / Organisation	Detailed comments
66	Robert Philip Cunliffe	see response to q32
<p><b>Does the existing hierarchy categorise borough centres correctly?</b>  <b>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?</b></p>		
<p>Of respondents who answered the question:  14 said yes, 7 said no and 3 don't know  [14 did not answer the question]</p>		
14	Mayor of London	Richmond's strategic approach to its town centres should take account of the town centre network guidance set out in Table A1.1 of the Intend to Publish London Plan which establishes individual centres' night-time economy classifications, commercial growth potential, residential growth potential and office guidelines classifications. In this regard, Twickenham and Teddington are identified as having important areas of night time economy which are of local significance and Richmond is a more substantial area of regional or sub-regional significance. This should be reflected in the approach taken in the forthcoming Local Plan.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	Fundamentally, we do not disagree with the London Plan's heirarchy of town centres.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	We do not support changing the approach. We feel, however, that the council should produce a deficiency map, so that when sites come up for redevelopment, there is more leverage to insist that new facilities are provided.
28	Alice Shackleton on behalf of The Kew Society	<i>[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?]</i> No. The existing hierarchy provides protective measures for the smaller but locally useful areas.
31	Tim Catchpole on behalf of MESS	<a href="#">As above</a> . Yes, but again there is no mention of retail parks.
41	Anthony Swan	If a business wants to trade then let it. It will only succeed if there is the demand. Pop up shops/businesses has already been mentioned and should be encouraged. Reducing centres means moving businesses on. Larger developments like Lidl should be encouraged because they are in the right place. Because there is a big enough footprint and useful parking. Morrisons tried in Teddington, failed, and moved on. Let economics answer the above questions so long as any development is appropriate for its area.
42	Jeremy Gill	Utterly meaningless. A disgraceful document.
44	Roger Cutler	Too many road closures as the result of parades & fairs.
45	Sally Beeson	If a parade of shops is in decline, then maybe its use could be changed to accommodate new building of fewer shops and flats
46 (a)	Joan Gibson	No change needed
47	Trevor Rowntree	I think the local centres are very important. I live near a local centre and feel very under catered for. More should be done to encourage the growth of local centres rather than town centres.
49	Margaret Edwards	Having lived in St Margarets and Kew I believe there is value in trying to sustain local parades to reduce the need to travel for everyday shopping. In Strawberry hill the parade is limited but has some useful stores/food outlets.
51	Su Bonfanti	I think the hierarchy of centres is still useful and that East Twickenham is correctly classed as a local centre, i.e. not suitable for the biggest stores or for the night-time economy, but intended to provide for largely local needs, including through specialist shops. Generally I think people here don't want to lose retail space, but I agree there should be flexibility of use to allow businesses to change how they work and to allow businesses to share space if they think their offerings are compatible. Similarly, it would be good to have more flexibility around conversion to housing. The question is how to retain the feeling of a local centre without ending up with a

Respondent reference no.	Name / Organisation	Detailed comments
		permanent array of vacant shops. One approach would be for certain locations to be amenable to conversion eg at the ends of the run of shop frontage in East Twickenham, on the corner of Rosslyn Road or under Poplar Court, where the loss of retail would not change the character of the local centre.
52	Winston W Taylor	Not sure. Again the further work may inform this.
55	Jon Rowles	If the council are not careful, we will only be left with coffee shops, nail bars and takeaways. In smaller town centres like Whitton we may need more areas designated as key retail, as it's not just about percentages but absolute numbers too.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	As your local centres, neighbourhood centres and parades are relatively well spread across the borough they are significant in contributing to the borough's achievement of both sustainable development and reduction in carbon emission given that they enable local communities to access shopping facilities mostly by walking, cycling or public transport.
63	Carol Rawlings	The local parade in Ham Street was identified for improvement 24 years ago when I first moved into the borough but nothing has been done about it. At present it is an eyesore and there are retail spaces that have been unoccupied for years. This is a parade that needs redeveloping with a reduced number of shops.
66	Robert Philip Cunliffe	TAKE THIS OPPORTUNITY to have a radical rethink to come up with a minimum impact sustainable strategy
68 (a)	Mark Jopling	Each community should nurture its own High Street and local traders.
69	Geoff Bond on behalf of Ham and Petersham Association	You seem to have forgotten that Ham Parade is a critical centre. Ashburnham road is also important. Without these flourishing more car journeys will be made and the local community with diminish in cohesion and wellness.
<b>If the evidence supports a more flexible approach to retail policies, what other uses should be encouraged? - Please give us your comments here:</b>		
7	Michael P Martin, Milestone Commercial	Can I suggest a meeting with local commercial property specialists to discuss the evolution of the High Streets and the protections therein sought by the local plan. The commercial property agents are on the coalface of keeping the local parades busy against overwhelming market conditions and we feel it best to work in partnership with LBRUT to expand the knowledge base, in both directions, as the parades move ever further away from sustainability as traditional retail.
14	Mayor of London	Much of Richmond's intended approach towards the borough's commercial centres and hubs is based on traditional ways of managing town centre development. Richmond should take into account the changing nature of retailing and consumer behaviour. There has been a general decline in retailing across London with high street operators losing market share to online traders. The impacts of these changes have been considerable and many high-street operators are re-establishing themselves through new business models. To maintain vibrancy in London's town centres, the wide range of town centre uses identified in Intend to Publish London Plan SD6 should be considered acceptable in Richmond's town centres including office development, residential, social infrastructure, cultural uses and leisure uses.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	We cannot be precise about our views on the balance of uses in Central Richmond without the evidence the Council says it will be preparing. It seems highly probable that the current corona virus epidemic will have a major impact on retail, casual dining and the evening economy. Retail has been under stress for several years due to internet shopping and high rates and rents. The leisure sector has been increasingly under stress due to Equity Capital investors taking over of restaurant-chains and funding this with high levels of debt, discounting of meals, rising rents and staffing costs, thin profit margins and over capacity. Many already weak retail and leisure businesses will not survive. This raises major issues about commercial uses in Central Richmond in the future and the rate of economic recovery. Increasingly people may work from home or remotely and office use may decline. As discussed in the theme 'Protecting what is special', Richmond may best be served by focussing on its cultural and heritage assets including the Riverside and the Green. The Richmond Theatre and Orange Tree Theatre are already valuable assets. Perhaps increased provision for the visual arts and performing arts in conjunction with education in the arts could be a viable focus going forward. We are not in favour of relaxing the approach to retail planning policies and reducing the importance of the shopping-frontage policies, especially in George Street.  We are not in favour of introducing large-footplate retail in Central Richmond. For example, major retail development at Richmond Station in our view is not acceptable and would put at risk the viability and vitality of existing retail activity in Central Richmond.  We believe it essential that cumulative impact constraints should remain in both planning and licensing policy so as to avoid any increase in the anti-social behaviour, public nuisance and crime and disorder arising from alcohol consumption in Central Richmond, on the Riverside and on the Green.

Respondent reference no.	Name / Organisation	Detailed comments
		<p>We are most concerned at the prospect of any relaxation in the uses-classes, whereby planning control over restaurant and bar capacity is weakened. We are concerned at the possibility of permitted development rights being extended to the change-of-use of existing retail premises. We believe the marketing rule may become largely redundant but there should still be control over the future uses of Central Richmond.</p> <p>When making applications it is important that the applicant identifies all buildings within reasonably close proximity that are Listed or Buildings of Townscape Merit and the applicant should explain how the proposed development will not be detrimental to these buildings in respect of noise, pollution, etc.</p> <p>We continue to be concerned with the need for the Council to control noise from patrons of premises in the heart of Richmond, especially during the evening economy.</p> <p>We continue to be concerned with the need for the Council to control noise from extractors and other M+E plant supporting commercial premises in proximity to residential properties.</p> <p>We continue to be concerned with the need for the Council to control fumes and cooking-smells from commercial premises in proximity to residential properties. It is unclear how the Internet will effect retail activity in Richmond long-term, but clearly the changing market will need to be monitored and projections will need to be included in decision-making.</p> <p>We believe the policies in the current Local Plan cover these issues adequately and if further amplification is required we would suggest that it could be dealt with by subsidiary planning tools. We are concerned that the Direction of Travel document seems to suggest relaxation of existing controls that are essential to maintaining the health of Richmond.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Cultural and social uses such as art galleries, performance spaces and permanent market pitches.
28	Alice Shackleton on behalf of The Kew Society	As retail shopping switches increasingly to online shopping (this may become even more prevalent after the Coronavirus experience) it would be beneficial and, we think, welcomed by residents, for service uses such as physiotherapy, osteopaths, spas, beauty shops and would keep the area as a living area visited by residents. It seems inevitable that high street retail shopping will go through an even more severe decline – better to replace shops with service uses, than turn them into residences where the community use will be lost.
31	Tim Catchpole on behalf of MESS	Discourage retail park development as it generates too much traffic.
39	Solomon Green	There should be flexibility between office and residential use granted in town centres but not in predominantly residential areas. While, at present, it pays landlords to switch from office to residential, it was within the last forty years that the Council were anxious to resist a demand from landlords to switch the other way.
40	Jamie Edwards	Community centres. Youth clubs. New Libraries. Health and well being businesses / Gyms
41	Anthony Swan	Which would we prefer in Twickenham... Poundland or a shared workspace café? One is tat the other is a nursery for self starters, micro businesses, clubs and business communication. So Yes to scope for community centres. Office business rates and rents should be more flexible and accommodating. Areas should exist for retaining offices but make them affordable. Cafes are fine as is late opening but a night time economy is not. Even Magaluf is being more responsible and the majority of Families living in the area would not want that distraction.
42	Jeremy Gill	Again, meaningless waste of people's time even to read this, let alone write it.
44	Roger Cutler	Too many cafes. More re4tail required.
45	Sally Beeson	I think that there are too many coffee shops/cafes in my area and that local offices and businesses are important, as they bring trade into the small shops which are struggling and into the local economy. If there is no local business then an area just becomes stagnant - we need shops, businesses and housing to make a thriving and forward looking local area - all of these things

Respondent reference no.	Name / Organisation	Detailed comments
46 (a)	Joan Gibson	We should continue providing protection for post office – and add in small shared bank premises (or something of the sort). You should pedestrianise the main town centres as this makes them more attractive and increases footfall.
52	Winston W Taylor	Community use - The Elleray Hall proposals are important here - but this is just off the main Teddington shopping centre. I think Teddington has sufficient cafes and restaurants.
53	Richard Woolf on behalf of McDaniel Woolf Architects	An honest review of decommissioned and redundant retail sites. Both high street and larger shed sites.
55	Jon Rowles	Quite a number of key shopping frontage units have been lost to non-retail. I would argue that you need to check the numbers lost since the last plan and 'top' up the number with new designations.
56	Rob Kennedy, Environment Agency	café culture and drinking establishments
58	Michael Atkins, Port of London Authority	The PLA's Vision for the Tidal Thames (The Thames Vision) (2016) includes the goal to see more people people coming to enjoy the Thames and its banks. As such the PLA would broadly support instances
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	All uses which can co-locate and uses which meet community needs.
63	Carol Rawlings	Reinstatement of the local police station in Ham.
66	Robert Philip Cunliffe	INSIST that "true" dwelling space provisions MUST be applied to concessions from old "re-purposed" office space - otherwise this is storing up even more problems for the next generation
68 (a)	Mark Jopling	Flexible office space is the future, CV-19 taught many jobs can be done productively from home or at least without travelling to central London
68 (b)	Mark Jopling	Get ahead of the decline Big Box retail and encourage our local High Streets. Richmond can be a model Borough, we have many advantages to be progressive.
70	Melissa Compton-Edwards	Post Covid-19, businesses and employees may take a more favourable view of home- working, which would be beneficial for the environment, resulting in less road congestion and air pollution. However, not everyone lives somewhere suitable for home working, and people can feel socially isolated working from home, so it would be desirable if residents' local high street offered drop-in or bookable communal work hubs with cafe facilities.
<b>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?</b>		
22	Jimmy Wallace, Richmond Athletic Association	<a href="#">See comments above.</a>
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<i>Comments as above re using upper floors for housing:</i> We expect there to be increasing use of Central Richmond for residential use, especially above ground floor retail and other uses. Adaptation though may be difficult given the historic nature of many of the buildings. It may be worthwhile developing specific policies to return buildings to their original all residential use (with careful reference to historic photographs, etc.) especially in the non-core area such as Hill Rise/Richmond Hill where there is photographic evidence of how these buildings once looked as residences before shops were added in the 20th century. We urge there to be evidence prepared to help assess the balance in Central Richmond between residential, retail and office use.  <a href="#">See comments on controlling smells and noises above.</a>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Agent of change principle is the issue here. New developments should lead to bars and clubs being forced to close – unless the noise they are making is already unreasonable / illegal. This could have a negative cultural impact.

Respondent reference no.	Name / Organisation	Detailed comments
31	Tim Catchpole on behalf of MESS	Yes, there could be more housing (apartments) in our town centres.
39	Solomon Green	Yes. Especially if it is aimed at single occupants.
40	Jamie Edwards	NO MORE PEOPLE NEEDED! It just creates even more pressure on failing infrastructure.
41	Anthony Swan	Housing would work anywhere depending on the rent etc costs. I would not want housing on designated frontages unless most of that frontage is failing.
42	Jeremy Gill	Housing in houses, offices in office buildings. It's not Shoreditch.
44	Roger Cutler	There should be a more relaxed policy on housing. Developers need to take more responsibility for what they sell.
45	Sally Beeson	Yes a good idea
46 (a)	Joan Gibson	Not sure fully what you are asking here, but flats should be above businesses as this is efficient land use and noise or smells dealt with in the design of the build.
49	Margaret Edwards	People do need to be able to open windows for ventilation so double glazing etc only works in Winter to block out noise (unless you have air conditioning and this is not sustainable) People might exchange some noise for handy location especially if there is access to green space close by - Richmond Green for example.
52	Winston W Taylor	Depends on the further work being done. In principle I have no objection.
53	Richard Woolf on behalf of McDaniel Woolf Architects	With over 50% of space above retail sites vacant, it's more an issue of fire engineering and acoustic segregation.
55	Jon Rowles	Agent of change principle is the issue here. New developments should lead to bars and clubs being forced to close – unless the noise they are making is already unreasonable / illegal. This could have a negative cultural impact.
56	Rob Kennedy, Environment Agency	It should apply in designated frontages.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Residential use of upper floors should be encouraged and maximised to increase housing supply and meet local housing needs especially for single persons or couples without children.
61	Tom Minns	Yes
63	Carol Rawlings	It might result in being more noise and disturbance by delivery lorries at night.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	The effort of the government should be to make town centres less noisy (road resurfacing with special type of treatment, being careful with bins collection times, encouraging silent buses, etc.) and then yes to encourage more housing above shops. All residents should have minimum standards to live in which complies with WHO policies in terms of environmental pollution. Nobody should be asked to compromise on key standard of living (noise, etc.).
66	Robert Philip Cunliffe	Yes
68 (a)	Mark Jopling	As a last resort though local High Streets should be encouraged as trading and social hubs before being converted to residential.
68 (b)	Mark Jopling	Yes
<b>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.</b>		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<p><i>Comments as above in other sections:</i></p> <p>We cannot be precise about our views on the balance of uses in Central Richmond without the evidence the Council says it will be preparing. It seems highly probable that the current corona virus epidemic will have a major impact on retail, casual dining and the evening economy. Retail has been under stress for several years due to internet shopping and high rates and rents. The leisure sector has been increasingly under stress due to Equity Capital investors taking over of restaurant-chains and funding this with high levels of debt, discounting of meals, rising rents and staffing costs, thin profit margins and over capacity. Many already weak retail and leisure businesses will not survive. This raises major issues about commercial uses in Central Richmond in the future and the rate of economic recovery. Increasingly people may work from home or remotely and office use may decline.</p> <p>As discussed in the theme 'Protecting what is special', Richmond may best be served by focussing on its cultural and heritage assets including the Riverside and the Green. The Richmond Theatre and Orange Tree Theatre are already valuable assets. Perhaps increased provision for the visual arts and performing arts in conjunction with education in the arts could be a viable focus going forward.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>We are not in favour of relaxing the approach to retail planning policies and reducing the importance of the shopping-frontage policies, especially in George Street.</p> <p>We are not in favour of introducing large-footplate retail in Central Richmond. For example, major retail development at Richmond Station in our view is not acceptable and would put at risk the viability and vitality of existing retail activity in Central Richmond.</p> <p>We believe it essential that cumulative impact constraints should remain in both planning and licensing policy so as to avoid any increase in the anti-social behaviour, public nuisance and crime and disorder arising from alcohol consumption in Central Richmond, on the Riverside and on the Green.</p> <p>We are most concerned at the prospect of any relaxation in the uses-classes, whereby planning control over restaurant and bar capacity is weakened. We are concerned at the possibility of permitted development rights being extended to the change-of-use of existing retail premises. We believe the marketing rule may become largely redundant but there should still be control over the future uses of Central Richmond.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>Hounslow Council in their draft West of London Plan want to link up Hanworth with Whitton via a cycle route along the main roads. Each town centre should have good quality &amp; safe cycle routes planned for the communities they serve.</p> <p>Need to provide secure cycle storage near all stations – for example the cycle storage at Whitton Station is open to all comers thus its targeted by thieves on a regular basis and this discourages commuters using a bike for the first leg of their journey.</p>
31	Tim Catchpole on behalf of MESS	They should include more local business space to discourage commuting to central London and make up for the loss of such space to housing that has occurred in recent years under 'permitted development' rights.
40	Jamie Edwards	Get rid of business rates in the Bourough. That would totally rejuvenate the high streets.
41	Anthony Swan	<p>A centre strategy should include an ICE RINK as was lost in Richmond. There are sites that would work.</p> <p>Support sports, golf clubs and gyms. I know the excellent staff at the Council do this already.. but more could be done.</p>
42	Jeremy Gill	Once again, blindingly obvious. Some shops, some roads leading to them.
44	Roger Cutler	Car parking. It is no good building or developing anywhere if people won't visit because they can't park a car.
45	Sally Beeson	I think there has to be a common sense approach here - some car parking is a must, not everyone can shop on foot all the time. If there is such difficulty parking as in Twickenham, I tend not to shop there. I shop on foot locally as much as I can.
46 (a)	Joan Gibson	<p>Need a full review of public transport. I regularly wait 25minutes+ for buses to Whitton when I see other frequent services go past me half empty. The Whitton bus then comes packed to the gills. If a driver is off sick (which it appears many are always on sick) then drivers need to be taken off more frequent services to ensure the less frequent ones are covered. Trains to Whitton although 4 an hour come grouped together so the net effect is, they arrive every half an hour. Bus timetables need to be linked to train timetables, so when you leave the train you can get a bus quickly. If there are road works buses, cycles and pedestrians need to be given their own route so the road works do not affect their timetables. Road works must be done in a more joined up manner. When the exit to the A316 at Hanworth was closed by TfL they routed the traffic through Whitton but refused to change the traffic light sequencing at the Whitton A316 junction to allow the traffic (which included buses) to disperse. Instead we had miles of traffic jams which again made public transport unreliable.</p> <p>Cars must be stopped from crowding pavements. In Church Street Twickenham even, a single pedestrian cannot walk along the pavement as the pavements have been made narrow due to car parking spots (cars often then park on the kerb). Cars do not even need to access this road – they can use the road next to York House. Ban the car on roads such as this and town centres.</p>
47	Trevor Rowntree	I live near Heathside (Powder Mill Lane) and I feel it needs investment. The Duke of York has been closed for a long time. This should be reopened by offering reduced rates to any chain willing to reopen it. The council should investigate some money in developing this area to make it more pleasant which would hopefully encourage better establishments to open shops in this area. A public house is a key part of a local centre.
49	Margaret Edwards	As crossing the river creates traffic it is desirable to have sufficient services and housing in each centre. The use of private cars to transport children to and from school needs to be reduced, possibly by incentives for parents or schools such as increased bus frequency at key times, time banking schemes that encourage volunteers to accompany small children on foot, bike or bus, car pooling.

Respondent reference no.	Name / Organisation	Detailed comments
52	Winston W Taylor	Not enough time to do the research to answer this.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Connectivity , viability , place making and architectural delight.
55	Jon Rowles	- People who live at the top end of Heathfield Ward have no direct bus service to Whitton High Street and this cuts off a lot of elderly people from their community. - Need to develop cycle routes into Whitton Town Centre to encourage more of an active lifestyle. There is only one part-time cycle route near the high street, and that only operates early in the morning for Twickenham School pupils. - If the telephone exchange comes up for redevelopment - it should be used to extend the town centre and provide extra shops and offices.
63	Carol Rawlings	The development of Ham would lead to a change of character for the area, decreased open space and a dangerous and polluting increase in road traffic. The roads are narrow and choked by residential parking already. Even if basement parking lots were built into the plan, the increase in traffic would be unacceptable. There are blind corners in some roads that are already dangerous.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	For East Twickenham, it's critical that they include the policies from the Village Plan that are still relevant and consider any development in context of the Conservation area and buildings of township merit. The approach needs to be holistic. The Local plan should also enable to unlock the right amount of budget to significantly improve high streets which are in the most need. East Twickenham is in dire need of improvement.
69	Geoff Bond on behalf of Ham and Petersham Association	They should look at all wards, but Ham and Petersham, the most inaccessible in terms of transport has been forgotten.
70	Melissa Compton-Edwards	I agree with Richmond Cycling Campaign that any long-term vision for the borough needs to make our town centres people rather than car-centric. None of our town centres should be a place to 'drive through', nor should their space be so dominated by provision for motor vehicles. I think successful town centres are pedestrianised where at all possible, and they support frequent, smaller shopping journeys - and the borough, as part of this strategy, should be discouraging or closing 'out-of-town' style shopping centres built around large car parks.
<b>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?</b>		
7	Michael P Martin, Milestone Commercial	<a href="#">Please see comments above.</a>
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<i>Comments as above in other sections:</i> We are not in favour of relaxing the approach to retail planning policies and reducing the importance of the shopping-frontage policies, especially in George Street. We are most concerned at the prospect of any relaxation in the uses-classes, whereby planning control over restaurant and bar capacity is weakened. We are concerned at the possibility of permitted development rights being extended to the change-of-use of existing retail premises. We believe the marketing rule may become largely redundant but there should still be control over the future uses of Central Richmond.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to fully review it – and not just take the predetermined view that it needs to be reduced. Indeed, many residents in Whitton want the percentage of retail units to increase in Whitton.
31	Tim Catchpole on behalf of MESS	Key shopping frontages and secondary shopping frontages should be retained.
39	Solomon Green	Core retail comparisons are probably less necessary as many, if not most, compare online.
40	Jamie Edwards	You should make it compulsory to have high quality, colour coded shop fronts that are kept in acceptable condition.
41	Anthony Swan	Some key frontages are important for maintaining the character of a shopping or High street. Some are not. Let economics mainly see which shops remain, move to a pop up shop somewhere, which should be encouraged.

Respondent reference no.	Name / Organisation	Detailed comments
42	Jeremy Gill	Do you mean that our High Streets should have some shops on them? Yes.
44	Roger Cutler	True competition should be allowed. Most importantly, retail units should be desirable & profitable places for people to work.
45	Sally Beeson	Two small and very successful shops in Teddington have recently closed, because: The landlord increased the rent and leasehold years Local people would go into one shop and buy online instead - thereby increasing van traffic many fold
46 (a)	Joan Gibson	The retail units at bottoms of flats need to be reduced and used for community and business space
49	Margaret Edwards	See 34 above.
52	Winston W Taylor	Again, further research is required to answer this. In general I think we ought to reflect demand from the most vulnerable and ensure the shops they depend upon are supported.
53	Richard Woolf on behalf of McDaniel Woolf Architects	We need to reduce retail and decommission it strategically , rather than just let it wither.
55	Jon Rowles	The main threat town centres face is the near-total loss of retail - and if anything we need more protections not less.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	The amount of key shopping frontages should not be reduced and/or the secondary frontages reduced or removed altogether unless account is taken of market signals justifying their reduction. The amount of key shopping frontages define the extent of a town centre's important shops where the dominant retail facilities and footfall are concentrated. Core Shopping areas which correspond with designated key shopping frontages should be protected.
61	Tom Minns	Keep the spread we have. It reduces travel.
63	Carol Rawlings	The shopping parade in Ham Street/Ashburnham Road needs to be updated and the number of units decreased. At present it is an eyesore with several units unoccupied for years.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Shopping frontage should be maintained as much as possible to contribute to the livelihood of the neighborhood and key "retail needs" indispensable to the area should be identified and maintained.
66	Robert Philip Cunliffe	adopt a wider spread of convenience based shopping centres, and rationalise the delivery systems driven by the rapidly expanding use of internet based shopping, to avoid endless road use by competing internet companies.
68 (b)	Mark Jopling	As a last resort, thriving local High Streets are essential social hubs. The response to CV-19 has started to rebuild a stronger sense of community.
<b>Should the 'key shopping area' relating to the operation of permitted development rights continue to be both key and secondary frontages?</b>		
Of respondents who answered the question: 6 said yes, 2 said no and 10 don't know [20 did not answer the question]		
<b>Is it appropriate to continue to protect local top-up shopping facilities?</b>		
Of respondents who answered the question: 20 said yes, 1 said no and 5 don't know [12 did not answer the question]		
<b>Is it appropriate to continue to protect local top-up shopping facilities? - Should this protection only extend to food shops and/or some selected types of businesses?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<i>Should this protection only extend to food shops and/or some selected types of businesses?</i> They are extremely important to older people, who otherwise would only make it to the town centre once a week – or in some cases never get out of the house at all.
31	Tim Catchpole on behalf of MESS	Yes, in order to minimise travel.
41	Anthony Swan	I dont know what protection they get. Generally let economics decide.

Respondent reference no.	Name / Organisation	Detailed comments
42	Jeremy Gill	I don't know what you mean by that.
44	Roger Cutler	No
45	Sally Beeson	I think all small local shops need protecting
49	Margaret Edwards	Yes
52	Winston W Taylor	Not sure
55	Jon Rowles	No - we need to protect shops
56	Rob Kennedy, Environment Agency	Yes
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	This protection should extend to essential goods shops and post office facilities.
61	Tom Minns	Yes
63	Carol Rawlings	Yes
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Food shop
66	Robert Philip Cunliffe	All
69	Geoff Bond on behalf of Ham and Petersham Association	This should be all shopping needs to make sure we have a thriving community.
<b>Is it appropriate to continue to protect local top-up shopping facilities? - Is 400 metres an appropriate proxy for easy walking distance?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Yes, but where possible it should be shorter – to take into account that people are living much longer than when the policy was originally brought in.
28	Alice Shackleton on behalf of The Kew Society	Yes
31	Tim Catchpole on behalf of MESS	For most it would be more like 800m
39	Solomon Green	It could be doubled without any loss.
41	Anthony Swan	No. But Yes for a fir oerson and when its not belying down with rain.
42	Jeremy Gill	Do you mean can most people walk 400 metres? Why not say so. Yes
44	Roger Cutler	Yes. It is usually much further.
45	Sally Beeson	Yes
46 (a)	Joan Gibson	Too close - Whitton has just had a KFC and Dominos open in the High Street which 3000 school children can access
49	Margaret Edwards	yes
52	Winston W Taylor	No. Too much. I can now do 400m easily but after a spell in hospital at the end of last year I could not do 100m for a couple of months.
55	Jon Rowles	EU policy research which suggests a 300m walk to basic services is more appropriate.
56	Rob Kennedy, Environment Agency	Yes

Respondent reference no.	Name / Organisation	Detailed comments
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Yes
61	Tom Minns	Yes
63	Carol Rawlings	Yes
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Yes
66	Robert Philip Cunliffe	no - 600 metres
69	Geoff Bond on behalf of Ham and Petersham Association	yes
<b>Is it appropriate to continue to protect local top- up shopping facilities? - Should we continue to provide additional protection for shops selling essential goods and Post Offices generally?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Yes we strongly support this. They provide great value to the community.
28	Alice Shackleton on behalf of The Kew Society	Yes
31	Tim Catchpole on behalf of MESS	Yes
39	Solomon Green	Yes
41	Anthony Swan	Yes
42	Jeremy Gill	Yes of course. Why wouldn't you?
44	Roger Cutler	Definitely. Ensure there are banks present.
45	Sally Beeson	Yes
46 (a)	Joan Gibson	Yes and extend to banks
49	Margaret Edwards	yes
52	Winston W Taylor	Yes
55	Jon Rowles	Yes - these are extremely valuable, esp for the elderly
56	Rob Kennedy, Environment Agency	Yes
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Yes, because they support a sustainable and inclusive communities by making it possible for the elderly, women with children in pushchairs, people with disability and other families to meet top up shopping needs by Thewalking or cycling.
61	Tom Minns	Yes
63	Carol Rawlings	Yes
64	Johanna Eschbach on behalf of Richmond	Yes

Respondent reference no.	Name / Organisation	Detailed comments
	Bridge Residents Association	
66	Robert Philip Cunliffe	no
68 (a)	Mark Jopling	Yes
68 (b)	Mark Jopling	Yes
69	Geoff Bond on behalf of Ham and Petersham Association	yes
<b>Do we need to continue to protect pubs as strongly?</b>		
Of respondents who answered the question: 14 said yes, 8 said no and 3 don't know [13 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	In the more suburban parts of the borough, such as Heathfield Ward there is now only one open pub and one community association bar which mean the majority of the population either have to catch a bus or a taxi to go out and socialise. This is probably prompting a number of our younger residents to move out of the area. The test shouldn't be – do they currently offer food – but could it be reasonably provided. Otherwise you are creating an easy way for a developer to move in and make windful profits at the cost of the local community.
31	Tim Catchpole on behalf of MESS	It is better that pubs should serve food as well as drink. The pubs that remain are now gastro pubs.
39	Solomon Green	I do not know of any that do not sell some form of food even if it is only crisps.
41	Anthony Swan	But give the local community the chance to take them over. If that doesnt happen allow change of use.
42	Jeremy Gill	There are too any pubs already. We don't need to support them.
44	Roger Cutler	Too many pubs are closing.
45	Sally Beeson	These pubs could be used as dwellings perhaps as more people drink at home
46 (a)	Joan Gibson	Difficult one - if pubs are struggling that do not offer food - they need to offer food (they are a private business). The Duke or York at the end of Powdermill Lane was very unpleasant and attracted bad behaviour and drug dealing. It is good that this is going. Well run popular pubs stay open.
47	Trevor Rowntree	My local pub has been closed for a long time. I now do not have a pub in easy walking distance. This served as a community centre and the area is worse off since it has closed. What is being done to encourage the re-opening of the Duke of York pub?
49	Margaret Edwards	Pubs need to find ways to be of value, as fewer people drink alcohol and dont want to pay high prices for soft drinks the pubs need to offer social activities, free space for community groups - if they do this they should be protected
52	Winston W Taylor	At the moment unscrutable pub companies deliberately run down pubs by raising rents and other means and then sell to developers giving evidence that the pub is not viable. Developers then purchase knowing that the Council will refuse planning for two years but then grant it.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Stop the romantic nonsense of the ' happy boozer '.... the pub has seen its day. It was a 19th Century affectation
55	Jon Rowles	It has become common for developers to buy pubs and then refuse to let the out to try and get around the marketing requirements
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	They are community facilities where people meet to socialise.
63	Carol Rawlings	They are a valuable social gathering centre. Alternatively, require coffee shops to stay open.
68 (a)	Mark Jopling	Pubs to be encouraged to be more social hubs if the demand for their traditional product has declined in that neighbourhood
68 (b)	Mark Jopling	Pubs should be encouraged to think what their local community needs

Respondent reference no.	Name / Organisation	Detailed comments
69	Geoff Bond on behalf of Ham and Petersham Association	all pubs with and without food are struggling. Key is to remove the financial incentive to convert pubs to other uses
<b>Are the locally set thresholds for impact and sequential tests still appropriate?</b>		
Of respondents who answered the question: 4 said yes, 3 said no and 13 don't know [18 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The more pubs that are lost – the more important the remaining ones are.
46 (a)	Joan Gibson	I have no idea what these are - but find LBRuT planning accept and support developers results on sequential tests when they know they are incorrect - LBRuT know for THS Castell Hospital site is sequentially better than Bridge Farm, but still supported Bridge Farm site. What will LBRuT do to fix this.
49	Margaret Edwards	The doc is too long to look at all the detail
53	Richard Woolf on behalf of McDaniel Woolf Architects	Economic viability testing should end ... it's no longer fit for purpose.
60	Kingsley Izundu on behalf of The Royal Borough of Kingston upon Thames	The level of locally set threshold for impact and sequential tests should be backed by research evidence to justify it.
<b>How long should shops and pubs be marketed before a change of use is allowed if the proposal is contrary to policy?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Two years is too short as landlords, and some large chains are prepared to keep a site empty as change of use can result in an uplift of value in excess of two years loss rent.
39	Solomon Green	For shops a maximum of six months but only if the asking rent is not deliberately set too high as is the case when landlords wish to obtain permission for change of use. Otherwise, say, five years (or more)..
41	Anthony Swan	Ah.. these can be run down on purpose and marketed at unrealistic prices related to their now lower turnover. A realistic view should be taken , maybe audit and spot checks, to confirm any claim of hopeless business conditions. A value judgement re length of time may then be made. Also ask the locals...
42	Jeremy Gill	Do you mean how long they should be allowed to stay vacant? Why not say so. 6 months.
44	Roger Cutler	The least time possible.
45	Sally Beeson	No idea
46 (a)	Joan Gibson	4 months
47	Trevor Rowntree	As long as required. Investors seem to be able to purchase properties and market them for an inflated price to force a change of use. Shop/pub change of use should no longer be granted to ensure this is not allowed to continue. If the shop/pub is not sold then sales should be forced and incentives should be offered to encourage the current use rather than accepting change of use.
52	Winston W Taylor	This must depend on the facts of each case. But there should be a signal to developers that it will not be allowed as being contrary to policy. Sham reports showing that a premises is unviable with designated usage should be examined much more critically than in the past.
53	Richard Woolf on behalf of McDaniel Woolf Architects	1 year.

Respondent reference no.	Name / Organisation	Detailed comments
55	Jon Rowles	Two years is too short - and most of the vacancies recorded in our high streets are down to landlords keeping units empty so they can gain a change of use and thus windfall profit. Maybe extend it to three years - ensure that its offered at the going rate from the outset.
56	Rob Kennedy, Environment Agency	1 year
60	Kingsley Izundu, Royal Borough of Kingston upon Thames	One year
61	Tom Minns	6months
63	Carol Rawlings	I don't know. As I can't easily access the local plan, it is difficult to know what you are referring to.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	At least 2 months but more than the time, these changes need to be shared with the relevant associations (including neighbours) to make sure the community can properly assess.
66	Robert Philip Cunliffe	6 months
69	Geoff Bond on behalf of Ham and Petersham Association	Pubs should a minimum of five years but change of use to should not be to residential but to other community uses after this time.
<b>Should a policy be developed for redevelopment of existing retail parks/stores in less central locations?</b>		
Of respondents who answered the question: 15 said yes, 4 said no and 4 said don't know [15 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Yes – some of the out of town 'sheds' are hugely space inefficient. Shops / offices should be retained on lower floors – with flats above. We need genuine mixed-use development – so maybe insist that new offices are included to address the shortage in the borough. Large supermarkets such as Sainsbury's St Clare's could become mixed use and provide much needed housing units and workplaces above the footprint of the existing floor.
32	Mark Jopling on behalf of UPPFT	Creatively re-build declining "big box" retail sites, car parks and railway stations to enable more housing without encroaching on green space.
28	Alice Shackleton on behalf of The Kew Society	Retail parks are prey to developers who will maximise economic gain by maximising density. It is essential that such retail parks are subject to a policy of redevelopment, focusing on height maxima (not tall buildings), provision of significant green space (for health and environmental reasons) and provision of on-site social infrastructure (usually dealt with by legal agreement).
31	Tim Catchpole on behalf of MESS	Yes, they take up a lot of valuable space and should be discouraged.
35	Alice Roberts, CPRE London	<b>Surface and multi-storey car parks, along with low-rise retail sites, should be redeveloped to make more efficient use of space and discourage car trips.</b> <ul style="list-style-type: none"> <li>• Surface car parks are an inefficient use of space and encourage non-essential car journeys. In Annex 1 a number of sites are identified which could be redeveloped to find space for housing and commerce and at the same time reduce reliance on cars.</li> <li>• These sites are viable and much more sustainable alternatives to Green Belt.</li> </ul> <b>[See Annex 1 in the Schedule of Call for Sites Responses]</b>
41	Anthony Swan	You don't need a policy for this. Judge it on a case by case basis but generally let economics and transport decide.
42	Jeremy Gill	I recommend you don't mess with this, you will only make people angry.
44	Roger Cutler	Only if they are properly planned & accessible. Should not, however, replace high streets.

Respondent reference no.	Name / Organisation	Detailed comments
46 (a)	Joan Gibson	If a shop is not working in a central location - it will not work in a less central location
53	Richard Woolf on behalf of McDaniel Woolf Architects	We are reordering land use at a much slower rate than in previous generations. Take a look at the long view. Respond quickly before land becomes redundant.
55	Jon Rowles	Most of these are very wasteful of space. The development could include local shopping facilities, offices and some housing.
60	Kingsley Izundu, Royal Borough of Kingston upon Thames	Such policies should encourage mixed use incorporating housing or for housing densification depending on context and constraints.
63	Carol Rawlings	Retail parks encourage people to use private vehicles. They could be redeveloped for social housing.
68 (a)	Mark Jopling	See above Massive opportunity to re-think the space dedicated to "Big Box" retail, building multiple storey developments over supermarkets and their car parks
68 (b)	Mark Jopling	Yes - the biggest opportunity in the Borough for housing
<b>Increasing jobs and helping business to grow</b>		
<b>Do you agree with the proposed policy directions?</b>		
Of respondents who answered the question: 17 said yes, 1 said no and 2 don't know [18 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Large housing schemes should also provide more workspaces or make a contribution to off-site ones.
19	DP9 Ltd on behalf of London Square Developments	<a href="#">See comments below.</a>
52	Winston W Taylor	Broadly agree
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We support the general direction of continuing to protect industrial sites to encourage SMEs and new businesses and to protect river-related business. It is essential that Richmond continues to be a place of employment not just a dormitory; this must be an essential contribution to shifting the current large outflow of commuting and its contribution to congestion, pollution etc
69	Geoff Bond on behalf of Ham and Petersham Association	Not enough emphasis on live work settings
<b>Should we continue to protect our industrial-type uses?</b>		
Of respondents who answered the question: 17 said yes, 1 said no and 2 don't know [18 did not answer the question]		
14	Mayor of London	<b>Industrial and Employment Land</b> The Mayor welcomes Richmond's intention to conduct an up to date Employment Land Review and carry out an industrial land audit to supplement its current evidence on employment land. Richmond should follow the Mayor's guidance set out in his Practice note on industrial intensification and co-location through planned and masterplan approaches. Guidance is also set out in Policies E4 and E7 of the Intend to Publish London Plan and should be embedded in the draft Local Plan. Again, these policies are subject to Directions from the Secretary of State. Richmond should clearly differentiate its approach towards industrial and office development.

Respondent reference no.	Name / Organisation	Detailed comments
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	There is a risk the council is misreading the market about industry use not being in demand and being replaced with distribution. What we are more likely to be seeing is the Heathrow airports freight business edging out local manufacturing businesses by out bidding them.
46 (a)	Joan Gibson	You should continue to protect business premises, but add new small low-cost premises instead of or as well as retail units at the bottom of flats.
53	Richard Woolf on behalf of McDaniel Woolf Architects	I'm sorry ... I'd love to say ' yes ' , but I know the direction of travel is away from manufacture and has been for 30 + years.
58	Michael Atkins, Port of London Authority	The PLA supports the intention of the policy directions to establish Agent of Change principle into policy, which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. This must be included in any future Local Plan policy in line with paragraph 182 of the National Planning Policy Framework (NPPF) and the emerging London Plan.
<b>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?</b>		
14	Mayor of London	<a href="#">See comments below.</a>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Should focus on the latter – as more local jobs will help us improve the environment.
31	Tim Catchpole on behalf of MESS	We recommend a study including survey work is required in order to properly shape this policy.
41	Anthony Swan	Encourage further industrial and employment. Always.
42	Jeremy Gill	No
44	Roger Cutler	Yes - be pro-active. It would be a start if you weren't trying to reduce industrial use. Twickenham Embankment & businesses on Eel Pie Island are due to be starved out by making the Embankment traffic-free. No existing businesses can survive without collections & deliveries. Local trades-people will lose work because they can't park vans.
45	Sally Beeson	I think a locally distinctive policy could be decided on locally by residents and business
46 (a)	Joan Gibson	No you should build flats above business premeses - more efficient land use, employees and customers on site.
47	Trevor Rowntree	Yes. industrial / employment uses should be given priority over residential sites.
51	Su Bonfanti	I support the general direction of continuing to protect industrial sites to encourage SMEs and new businesses and to protect river-related business. It is essential that Richmond continues to be a place of employment not just a dormitory; this must be an essential contribution to shifting the current large outflow of commuting and its contribution to congestion, pollution etc. I don't recall that you have really linked local employment and environmental impact together in your policies before and I think this is something you need to get across to residents more.
52	Winston W Taylor	Not enough time to consider properly
53	Richard Woolf on behalf of McDaniel Woolf Architects	I'm sorry .... I'd love to say ' yes ' to support of industrial use , but where are the manufactures for the 21st Century located ?? Not in Greater London.
55	Jon Rowles	We need a more local approach that encourages further industrial / employment uses - due to the large amount of space already lost.
60	Kingsley Izundu, Royal Borough of Kingston upon Thames	Given that the emerging London Plan places Richmond Council on the "Restraint" category in regard to managing its stock of industrial land, it seems reasonable to Richmond to adopt a more locally distinctive policy that focuses less on introduction of residential on industrial sites.
68 (a)	Mark Jopling	Need Richmond to be ahead of economic shifts driven by automation and ecology
<b>Should we continue to specify flexible small-scale units suitable to meet local business needs?</b>		

Respondent reference no.	Name / Organisation	Detailed comments
Of respondents who answered the question: 17 said yes, 1 said no and 1 don't know [19 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	We are very close to Heathrow Airport and thus larger sites are likely to be used for freight forwarding that employ relatively few people and provide lower quality jobs.
31	Tim Catchpole on behalf of MESS	This will depend on the study outcome.
44	Roger Cutler	Small-scale units are essential. Stop trying to force them out of business.
46 (a)	Joan Gibson	At the bottom of flats instead of retail
53	Richard Woolf on behalf of McDaniel Woolf Architects	Small scale is the best option.
<b>What priority should we give to employment uses over residential amenity, if at all?</b>		
2	CBRE on behalf of LGC Ltd, Teddington	<i>[See the Schedule of Call for Sites Responses relating to Queens Road site Teddington]</i>
19	DP9 Ltd on behalf of London Square Developments	<p>On behalf of our client, London Square Developments, we submit the following representations to the London Borough of Richmond upon Thames Local Plan Direction of Travel Consultation and Call for Sites. These representations relate to the Greggs Bakery, Gould Road, Twickenham, known as the 'Site'.</p> <p>The existing Site comprises the former Greggs Bakery Site in Twickenham, within the London Borough of Richmond Upon Thames. The Site is L shaped and is bound by the River Crane to the north and railway line beyond, residential properties on Norcutt Road to the east, Edwin Road to the south, residential properties on Crane Road to the west and further residential properties on Crane Road/ Gould Road and at Crane Mews to the north west.</p> <p>There are a range of buildings covering the majority of the Site which comprises an area of 1.1ha. The majority of the Site is covered by a single storey industrial shed alongside large extract equipment. There are also a number of associated two and three storey commercial buildings across the remainder of the Site which have developed in a piecemeal way over time. The existing buildings have reached the end of their life cycle.</p> <p><b>Background</b> By way of background, the Site is subject to a planning application (ref. 19/0646/FUL) for residential-led redevelopment. This application was submitted in February 2019 and is pending determination. It is the project team's firm position that the Site is appropriate for residential-led development as set out within the planning submission and as explained further below.</p> <p>The Site is currently allocated within the 'Locally Important Industrial Land and Business Park – West Twickenham Cluster (including Greggs Bakery and surroundings), Twickenham' under the adopted Local Plan. The Site also falls within the 'Key Office Area – West Twickenham Cluster' under the adopted planning policy position.</p> <p>Representations were made to the currently adopted Local Plan (July 2018). These representations to the new Local Plan follow the same matters raised in relation to this Site. It was thoroughly demonstrated that the Site is inappropriate for continued employment use and this position was supported by the Council's own evidence base assessment (Employment Sites &amp; Premises Study, 2017 prepared by Peter Brett Associates). The report identifies the 'West Twickenham Cluster (including Greggs Bakery and surroundings)' as a designated site that is less attractive to occupiers and identifies it as being constrained by poor access, particularly for HGV's, and by its residential surrounds. Paragraph 3.10 of the Study states that the West Twickenham Cluster is "located within residential areas like many of Richmond's</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p><i>industrial sites, but they also have particularly poor access arrangements that significantly constrains their potential for redevelopment for alternative forms of industrial use."</i></p> <p>Despite the locational disadvantages identified within the LBRuT Employment Sites and Premises Study (2017), which formed part of the Council's evidence base, the Site was allocated within the 'West Twickenham Cluster (including Gregg's Bakery and surroundings)' which seeks to protect the use of the land for employment. This approach is inconsistent with Paragraph 82 of the National Planning Policy Framework ('NPPF') which directs industrial uses to suitably accessible locations. The allocation of the Site is also contrary to draft London Plan Policy GG5 which requires Boroughs to plan for sufficient employment and industrial space in the <u>right locations</u>.</p> <p>Prior to the adoption of the current Local Plan in October 2013, the LBRuT published the Local Plan 'Site Allocations Plan' for consultation. Within this, draft Policy TW 11 (West Twickenham cluster, Twickenham) identified the Site for <i>"Mixed residential, start-up and small scale hybrid business space and/or primary school. Proposed Designation as key employment site."</i> This document was not taken forward and has been superseded by the adopted Local Plan (July 2018), however this represents the Borough's initial approach to the Site's redevelopment which was considered to be more appropriate in this location.</p> <p>In the intervening period since the adoption of the Local Plan in July 2018, the Site has been marketed by Colliers International's marketing team for employment uses. This has occurred over a period of more than two years since January 2018 and is ongoing. To date no meaningful offers have been received for the Site due to the severe site restrictions. It is acknowledged within the Marketing Report prepared in support of the planning application that there are strong trends for West London industrial markets in prime locations such as Park Royal, Acton and Heathrow. However, it is recognised that these areas benefit from superior logistical and distributional links. The Site's location within a residential area is off-putting to industrial occupiers as the roads surrounding the Site are unsuitable for large delivery vehicles and has deterred a number of potential occupiers, as demonstrated within the Marketing Report.</p> <p>Offers have been invited for the Site in its current use as industrial/ employment generating floorspace. The Marketing report concludes that the agents cannot let the Site due to the current configuration and Site restrictions. It is confirmed that potential industrial or warehouse occupiers were put off by the physical constraints associated with the Site. The reasons were identified as: the size and configuration of the buildings which are not fit for current uses, the small yard and insufficient car parking area which are an issue owing to the high site coverage, the tight arrangement of the units within the loading bay which is difficult to navigate in certain areas, concerns with regards to road access into the Site and traffic movement of HGV's and vans for deliveries and the surrounding established residential area and concerns with regards to potential restrictions on noise and hours of use.</p> <p>These long-standing issues forced Greggs to relocate bakery operations to a more appropriate site which has better logistical connections. The Site is now redundant and the bakery operations have ceased with only part of the Site in continued use for associated operational functions. The Site is in poor condition, comprises asbestos and would need significant expenditure in order to bring it up to modern standards.</p> <p>The Site was not considered to be suitable by any of the operators approached and no offers were forthcoming. There was interest in the Site for longer term redevelopment of the Site for residential use however commercial occupiers are deterred by the evident Site constraints.</p> <p>The marketing exercise has demonstrated that the redevelopment of the Site for similar employment generating uses would be an unviable prospect as the Site is too restricted to retain the same floor area and deliver sufficient servicing and car parking. As such there is no realistic prospect of a commercial operator occupying the Site either in its current condition or through redevelopment.</p> <p>The applicant has also sought advice from Milestone, a local commercial agent who supports the findings of the Marketing Report produced by Colliers and confirms that whilst there is demand for light-industrial units within the Borough, the registered demand is for purpose-built trading estates. Examples of these locally comprise Colne Road, Twickenham, Princes Works and Teddington Business Park. This type of commercial accommodation is able to accommodate car parking and open-plan design with mezzanine floors or double height workspace for fork-lift access in addition to turning circles for 7-tonne plus lorries. Additionally, these</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>estates have the benefit of enhanced electricity capability and dedicated waste management. The suitability of the Greggs Site to accommodate the same grade of floorspace is considered poor.</p> <p>It has been demonstrated within the Milestone report that there are plenty of much better located, more accessible, higher quality office buildings and Sites within Twickenham that are vacant and could accommodate any demand. This data is specific to the Site's location and is therefore a material consideration which should be taken into account. It is demonstrated in the evidence provided through the ongoing marketing exercise and from commercial agents that there is no demand for the use or redevelopment of this site for commercial employment generating uses.</p> <p>The demand for housing within the Borough is significant and should be prioritised over the restriction to retain the employment land uses in areas inappropriate for continued use. This approach is backed by planning permission ref. 17/1033/FUL which was granted on appeal on 23rd May 2018 for the redevelopment of the adjacent Lockcorp House, also within the West Twickenham Cluster, to deliver student housing. Importantly, the Inspector's report notes that <i>"whilst the loss of this existing employment site would conflict with Policies DM EM2 and LP40, the proposed student accommodation would meet and identified housing need which policies DM HO 5 and LP37 support. On the evidence before me, including what I heard at the hearing, I consider the need for the development outweighs that of retaining the employment use of the site."</i></p> <p><b>Draft London Plan update</b></p> <p>It is important and extremely relevant to note that the Secretary of State ('SoS') has identified that the draft London Plan Intend to Publish Version is not consistent with the NPPF and is therefore not sound and cannot be published. It is acknowledged by the SoS in his letter to the Mayor dated 13 March 2020 that the previous aspiration to 'retain' sufficient industrial capacity 'may not be realistic' and is inconsistent with the NPPF which importantly requires <i>"that sufficient land of the right type is available in the right places and at the right time to support growth and innovation."</i>(Emphasis added).</p> <p>In particular, the SoS recommends that Policy E4 is modified to remove the requirement for 'no net loss' of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS.</p> <p>The SoS recommends new supporting text at paragraph 6.4.8 which sets out that <i>"Where industrial land vacancy rates are currently well above the London average, Boroughs are encouraged to assess whether the release of industrial land for alternative uses is more appropriate if demand cannot support industrial uses in these location. Where possible a substitution approach to alternative locations with higher demand for industrial uses is encouraged."</i></p> <p>The proposed modifications are required to make it easier for London Boroughs to identify a supply of industrial land to meet demand, or to replace other land that can subsequently be released for housing development. It also removes the target that is deemed to be unrealistic.</p> <p>The currently adopted Local Plan policies and West Twickenham cluster site allocation were prepared in the context of the draft London Plan requirement to retain capacity, and this context has now changed significantly. This is of key importance in assessing the Greggs Site for redevelopment for alternative uses, particularly housing.</p> <p><b>Richmond Annual Monitoring Report</b></p> <p>Richmond's Local Plan Annual Monitoring Report (AMR) 2018/19 (September 2019) assesses the Borough's housing supply and delivery in relation to the adopted London Plan's requirement of 3,150 new homes over the period between 2015-2025. The Borough delivered a net gain of 419 units in 2018/19 and considers that it will meet its target by 2025. Richmond estimates a supply of 1,474 new homes coming forward over the five-year period, meeting the target in the London Plan 2015. However, it is noted that the draft London Plan sets an increased ten-year housing target of 4,110 net completions or 411 per year. This is a target that has not been disputed by the SoS during his review of the draft Plan. The London Borough of Richmond upon Thames has not yet demonstrated how they will meet these revised targets and the AMR therefore fails to demonstrate a five-year housing supply.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>Given the GLA's projected growth in the Borough's population, the need for housing in the Borough will continue to outstrip supply. This will continue to drive up house prices making the borough less affordable for all. Moreover, the borough has delivered only 17% (70 units net) of housing as affordable in 2018/19 which is considerably below the strategic borough-wide target (50%). Richmond will therefore need to consider further opportunities, including the Site, to deliver housing. The proposals for the redevelopment of the Greggs Site seek to deliver 116 new dwellings comprising a significant number of family-sized homes and affordable units. This contribution to the overall housing supply and affordable housing provision in the Borough should not be overlooked.</p> <p>-----</p> <p><b>Delivering new homes and an affordable borough for all – p. 19</b></p> <p>We support the consideration of further locations for housing delivery, including site allocations to meet housing need. Brownfield employment land that is unviable for continued use, including the subject Site, should be considered for this purpose.</p> <p><b>Increasing jobs and helping business to grow – p. 28-29</b></p> <p>It is acknowledged by the SoS in his letter to the Mayor dated 13 March 2020 that the previous aspiration to 'retain' sufficient industrial capacity 'may not be realistic' and is inconsistent with the NPPF which requires "that sufficient land of the right type is available in the right places and at the right time to support growth and innovation." In particular the SOS recommends that draft London Plan Policy E4 is modified to remove the requirement for 'no net loss' of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS.</p> <p>It is considered that investment in industrial and employment land to encourage redevelopment and refurbishment for modern industrial occupiers will not necessarily spur demand. Locational characteristics are important for occupiers, particularly access provision and potential for land use conflict.</p> <p>As outlined above, the Site is not suitable for continued employment use and is blighted by highways impacts and locational difficulties. In light of the SoS' guidance and in line with the NPPF, the allocation of the Site which is in an unsuitable location for continued employment use should be reviewed. The need to 'retain' capacity is unrealistic and should be relaxed.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Delivery noise can be very disturbing – esp. when it involves HGVs. So maybe focus on restricting the really disturbing activities, rather than keeping the whole site shut.
31	Tim Catchpole on behalf of MESS	<a href="#">See above</a> . This will likewise depend on the study outcome.
41	Anthony Swan	Its a balancing act. eg if a business park was near a school then objections may be valid because of pollution. If near houses then which was there first. Maybe the business park businesses are too industrial for its coexistence with domestic housing.
42	Jeremy Gill	Depends on the individual circumstances, you can't have a meaningful policy about something so case-specific.
44	Roger Cutler	A properly planned assessment is needed in every case. No priority should just be given.
45	Sally Beeson	In individual case should be looked at individually and not as a lumped together policy
46 (a)	Joan Gibson	none they can both be built at the same site
47	Trevor Rowntree	Employment uses should be given priority. Neighbours' objections should be taken in to account but should not override the benefit to the whole area.
52	Winston W Taylor	Neighbours will almost always object. I moved into a flat 35 years ago close to Teddington Business Park. Neither I or my neighbours had any problems - noise. traffic or otherwise with it. Business does need some sort of priority to override unjustified residential complaints.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Agree on the wholesale redevelopment of industrial sites rather than permitted development reuse which provides poor quality dwellings.
55	Jon Rowles	All depends on what is reasonable - could make the agent of change pay for soundproofing and have a more detailed policy on what amount of noise is acceptable when.
63	Carol Rawlings	Residential amenity should be given priority. But let's wait and see what emerges from the current virus crisis. All will change.....

Respondent reference no.	Name / Organisation	Detailed comments
68 (b)	Mark Jopling	Flexible office space is key. Lesson from CV-19 is that we don't all need to herd into Central London 5 days per week - more flexible local office space would make a big difference to carbon footprint and quality of life
69	Geoff Bond on behalf of Ham and Petersham Association	Impact on neighbours matters so should be a consideration
<b>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?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Many small businesses used to occupy space above shops, but most of these spaces have now been converted to flats, leaving town like Whitton with virtually no office space.
36	Tim Catchpole on behalf of MESS	<a href="#">See above.</a> This will likewise depend on the study outcome.
41	Anthony Swan	Low rent/rate shared space with flexible rental periods. ie down to 1 month. High level of security for eg their computer equipment.
42	Jeremy Gill	Offices, I would imagine.
44	Roger Cutler	Car parks or parking facilities.
45	Sally Beeson	Existing building - eg the now empty Nat West and Lloyds Banks in Teddington
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough. Do not provide parking spaces for businesses. For existing parking spaces, until they are removed, heavily increase parking levy and charges.
52	Winston W Taylor	The "Space" development in Teddington appears to be successful - that is purely an observation on my part looking at the number of small business logos in reception - if I am right, similar facilities might be encouraged elsewhere.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Well , the space above shops and the beneficial use of historic buildings, decommissioned places of worship etc ...
55	Jon Rowles	- In Whitton, there is hardly any office space left. - Need more flexible office space for start-ups in places like Twickenham and Richmond that are suitable for new businesses. The existing providers are very expensive so maybe there is something that could be incorporated into libraries or the town hall - as some form of social enterprise incubator outfit.
63	Carol Rawlings	Fast, affordable and reliable broadband is urgently needed throughout the borough to support home-working.
68 (a)	Mark Jopling	See above, growth in flexible office spaces as people avoid travelling to central London
69	Geoff Bond on behalf of Ham and Petersham Association	Local small offices not all centred on a small number of locations.
<b>Should we encourage and protect river-related business?</b>		
Of respondents who answered the question: 17 said yes, 0 said no and 2 don't know [19 did not answer the question]		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	We support protection of riverside employment.

Respondent reference no.	Name / Organisation	Detailed comments
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	It adds greatly to the character of the area – and is a very good way of increasing the employment opportunities for those without many qualifications.
31	Tim Catchpole on behalf of MESS	This also needs to be addressed in this study.
44	Roger Cutler	At the moment you are trying to destroy them in Twickenham.
45	Sally Beeson	It's unique
46 (a)	Joan Gibson	Is it needed?
52	Winston W Taylor	This has not been the case, in my experience, for some time.
53	Richard Woolf on behalf of McDaniel Woolf Architects	100% !!
55	Jon Rowles	More boat houses could be provided both for small boat and rowers etc
58	Michael Atkins, Port of London Authority	It is welcomed that the Direction of Travel document states that the council will continue to protect river dependent facilities such as boatyards, wharves, slipways, piers, jetties and more. This approach is supported by the current and emerging London Plan for example emerging London Plan Policy SI16 (waterways - use and enjoyment) specifically states that development plans should protect and enhance waterway infrastructure to enable water-dependent uses. This is also supported by the PLAs Thames Vision which includes the goal to see more goods and materials routinely moved on the river. These existing businesses make a vital contribution to the borough and must continue to be protected, in line with current adopted plan policy.
<b>General comments relating to this topic area</b>		
14	Mayor of London	With regards to office development Richmond should take note of Policy E1 of the Intend to Publish London Plan, which directs new office development to the borough's town centres and regard should also be given to Table A1.1 which sets out the office guidelines identifying those town centres with the greatest potential to accommodate different types of office development. It identifies Richmond major town centre as having high commercial growth potential and suitable for both speculative and mixed-use office development while Twickenham is identified as having potential for mixed-use office development. East Sheen and Teddington are identified as having existing small office capacities which should be protected. Richmond should clearly differentiate its approach towards industrial and office development.
19	DP9 Ltd on behalf of London Square Developments	<b>What do we have to find out? - p. 32</b> We consider that intensification, co-location or storage and distribution use on the subject Site is inappropriate considering its poor access via residential roads and the potential for harm to the amenity of surrounding residents. Such development should be directed to suitable locations which benefit from greater logistical arrangements <b>What do you think? – p. 33</b> In light of the SoS' response to the draft London Plan, the approach to protection of industrial uses requires further consideration. The findings of the LBRuT Employment Sites and Premises Study (2017) accurately reflects the significant site constraints that existing at the Greggs Bakery Site. We are confident that further studies that form part of the evidence base for the next Local Plan will reach the same conclusions and this should be reflected in the allocation of the site for residential use. Policy direction should be towards flexibility in relation to unviable employment land uses in areas inappropriate for continued use in order to meet strategic objectives such as housing delivery. Housing delivery is a pressing issue facing London, and in particular the Borough. The delivery of housing should therefore be a key priority in the new vision for the Local Plan. The use of Brownfield Sites for residential development should be a key policy aspiration which outweighs the need to protect inappropriate sites for continued employment use. This is a view that shared by the Planning Inspector in respect of the adjacent site at Lockcorp House which is also within the West Twickenham Cluster as outlined above.
27	Peter Willan, Paul Velluet and Laurence	We cannot be precise about our views on jobs in Central Richmond without the evidence the Council says it will be preparing. Richmond is attractive to international service companies such as PayPal and encouraging similar businesses to locate in Richmond is important.

Respondent reference no.	Name / Organisation	Detailed comments
	Bain on behalf of Prospect of Richmond	Encouragement of small businesses, start-ups and the like we believe is important.
<b>Protecting what is special and improving our areas (heritage, culture and open land)</b>		
<b>Do you agree with the proposed policy directions?</b>		
Of respondents who answered the question: 20 said yes, 2 said no, 1 both agreed and disagreed and 2 said don't know [13 did not answer the question]		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<p>We believe the policies in the current Local Plan adequately cover the issues outlined below on Heritage, Culture and Protecting Open Space, and if further amplification is required we would suggest that it could be dealt with by subsidiary planning tools. We are concerned that the Direction of Travel seems to relax the controls that already exist and which are essential to maintaining the heritage, culture and green infrastructure and open land.</p> <p>Broadly we support the Direction of Travel on encouraging visitors and tourism. It is important that residents are supported in their efforts to maintain the heritage and culture of Central Richmond, the Riverside and the Green not only for their own benefit but for the wider community and visitors.</p> <p><a href="#">As we say in para 33 above</a>, promoting heritage and culture in the heart of Richmond should possibly be a prime objective, as some of the current uses of Central Richmond decline. This could involve the visual and performing arts and education in the arts. It would involve wider participation.</p> <p>The Riverside and the terraces are also a place for visitors and residents to relax and enjoy the scenic river Thames. <a href="#">[comments as in Heritage section]</a></p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>We disagree that the Village Plans should be discontinued. These are based upon Neighbourhood Plans – and are very useful in ensuring the local population can contribute to how their town develop.</p> <p>There are also very useful for historic towns such as Twickenham and Richmond to have a whole town approach to managing their heritage rather than through conservation areas which fragment the approach (and in this borough most of the conservation statements are out of date). Without them we are disadvantaged compared to Ham &amp; Petersham that have a full singing and dancing a Neighbourhood Plan. This is likely to result in other areas of the borough applying to create their own neighbourhood forums.</p>
28	Alice Shackleton on behalf of The Kew Society	We do not see a justification for altering the existing policies in the adopted Local Plan and are concerned that certain proposals ( <a href="#">see our reply below in relation to development impact on character and or appearance of conservation areas</a> ) would water down such protections.
20	Gary Backler, Friends of the River Crane Environment.	<u>Green Infrastructure</u> : FORCE strongly supports the objective of protecting and where possible enhancing “The rivers, surrounding banks and green spaces, along with their biodiversity and wildlife.” We also welcome the recognition of “opportunities associated with new development to enhance access and to improve poorer quality areas such that they provide a wider range of benefits” (p38). FORCE is strongly in favour of investing to improve underutilised open spaces for public and environmental benefit, rather than taking their underutilisation as a cue to build on them.
37	John Waxman, Crane Valley Partnership	I would like to highlight that CVP and the Colne Valley Regional Park, working in association with environmental consultants ARUP, have recently produced the Colne and Crane Valleys Green Infrastructure Strategy. [This document, along with an associated interactive map, can be viewed online via: <a href="http://www.cranevalley.org.uk/news/post/Colne-and-Crane-Valleys-Green-Infrastructure-Strategy-published.html">http://www.cranevalley.org.uk/news/post/Colne-and-Crane-Valleys-Green-Infrastructure-Strategy-published.html</a> .] This strategy promotes the landscape-scale approach and lists a wide range of environmental enhancement opportunities. LBRuT was one of the strategy consultees. The Borough’s revised Local Plan should make reference to the strategy and should be aligned to it.
42	Jeremy Gill	No idea what you're talking about
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
68 (a)	Mark Jopling	Do more to protect the street scene in Victorian/Edwardian that are not BTM

Respondent reference no.	Name / Organisation	Detailed comments
69	Geoff Bond on behalf of Ham and Petersham Association	There is a significant risk, not mentioned, to increase the urbanisation of Conservation areas. This should be clearly and definitively controlled
<p><b>Are our current policies strong enough to ensure the ongoing protection of the borough's historic assets?</b></p> <p>Of respondents who answered the question: 5 said yes, 9 said no and 9 said don't know [15 did not answer the question]</p>		
3	Katie Parsons, Historic England	<p>As the Government's advisor on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore we welcome the opportunity to comment on the draft document these comments have been formed in line with the NPPF (2019) and with reference to draft New London Plan (At time of writing this is the Intend to Publish version (dated December 2019) available: <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019">https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019</a>) which will become part of the Borough's development plan when adopted. It is understood that the new Local Plan for Richmond borough will replace the current Local Plan and Twickenham Area Action Plan.</p> <p>The new plan is an opportunity to make real advancements in how the historic environment can be conserved or enhanced. This goes far beyond ensuring that wording complies with up-to-date national legislation and policy, but should be locally specific, detailed and aspirational while being realistic.</p> <p>The current policies are helpful but they can be strengthened and provide more guidance to applicants and decision makers. For example, heritage policies can do more to link conservation aims with maintenance activity, policies to tackle carbon emissions should make specific provisions as to how historic buildings can be retrofitted without making damaging fabric, and should highlight the risks of maladaptation than can cause a building to be less thermal effective; strong policies on the multifaceted benefits of green infrastructure and improvements that can be made to the historic environment through enhancing setting, improving access and enjoyment of heritage assets, and tackling flood risk which would help protect historic fabric etc. Looking at how policies can be improved demonstrates a positive, proactive strategy to conserve the historic environment. Policies should be revised over plan periods to reflect specific changes in development pressures and trends so we advise that up-to-date evidence is used. A good strategy will offer a positive holistic approach through the whole plan whereby the historic environment is considered not just as a standalone topic but as an integral part of every aspect of the plan, being interwoven within the entire document. The draft New London Plan advocates for a design-led approach to growth based on characterisation and understanding of local areas. We have commissioned several London-wide research report that would be helpful evidence sources for undertaking characterisation work:</p> <p><a href="#">Characterisation of London's Historic Environment (LUC) – full report</a>  <a href="#">London's Local Character and Density (Allies and Morrison) – full report</a>  <a href="#">London's Image and Identity – Revisiting London's Cherished Views</a></p> <p>Conclusion  We have produced a number of detailed Good Practice Advice and Advice Note documents that we recommend you review as part of your plan preparation process:  The Historic Environment in Local Plan – Good Practice Advice in Planning 1  <a href="https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/">https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/</a>  The Setting of Heritage Assets – Good Practice Advice in Planning 3  <a href="https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a>  The Historic Environment and Site Allocations and Local Plans – Advice Note 3  <a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/">https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</a>  In preparation of the forthcoming plan, we encourage you to draw on the knowledge of local conservation officers, the Greater London Archaeological Advisory Service, and local heritage groups.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposal, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p>
5	Helen Monger, London Parks & Gardens Trust	<p>The London Parks and Gardens Trust (LPGT) is a member organisation of the The Gardens Trust (GT) and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of planning consultations. LPGT contributed to the preparation of the 2018 Local Plan. Our comments were already made in the context that Outer London Boroughs would have to take considerable quantities of new development and that development should provide quality homes in attractive neighbourhoods with adequate provision of parks and open spaces for the mental and physical well being of the whole community. High density developments should still be well designed with access to parks and open spaces.</p> <p>We do not feel that these policies have had long enough to be applied/tested. These policies should be carried forward to ensure clarity for all new development proposals. Indeed, the revised context of the need for more housing and climate action calls for the protection and the enhancement of the quality of parks and open spaces whether designated heritage assets or not.</p> <p>We are aware that the government is instructing London to release industrial land for housing. This land is currently unlikely to have access to parks and open spaces, especially local green spaces. All new residential development must be within easy reach of well designed open spaces offering a variety of experiences and this should be provided in new residential areas.</p> <p>We look for local plan policies to carry forward principles already adopted eg                      Recognition of the value of both designated and non designated heritage assets                      Ensure investment in parks and open spaces via the development that contributes to its greater use.                      Taking care to avoid unintended consequences of development eg impact of views out from parks and open spaces and overlooking arising from tall buildings.                      Accessibility and functionality of parks and open spaces - increased densities mean a reduction in private amenity space, putting pressure on public space for activities and quite relaxation, policies should ensure easy access to a range of park landscapes.                      This is encapsulated in the adopted Local Plan in Para 8.3.6 &amp; 8.4.10                      "The borough's extensive provision of parks and open spaces enable local communities to lead lifestyles with greater levels of physical activity, resulting in better physical and mental health improvements, reduced stress levels and increased social interaction. These spaces provide a vital free resource in which people of all ages can play, exercise, relax and enjoy the natural world, so easy access for all residents to high quality open and natural space is important, particularly within identified areas of deficiency (see policy LP 31 in 8.4 'Public Open Space, Play Space, Sport and Recreation'). Parks and open spaces are particularly important in promoting activity in young children thereby targeting the increasing childhood obesity levels in the borough. Children's play space and outdoor 'green gyms' for use by the whole community are encouraged."                      "It is acknowledged that on-site provision may not be feasible or practicable for every major development site, but this will be assessed on a case-by-case basis, taking account of the existing open space provision relevant to the development site. Where it has been accepted by the Council that on-site provision cannot be made, the Council will expect existing surrounding open spaces to be improved, and where appropriate made more accessible to the users and occupiers of the new development. Financial contributions may be required to either fund new off-site provision, or improvements and enhancements of existing facilities, including access arrangements, in order to mitigate the impacts of new development."                      We wish the following policies to be carried forward                      Policy LP 1 Local Character and Design Quality, Policy LP 2 Building Heights, Policy LP 3, Designated Heritage Asset, Policy LP 4 Non-Designated Heritage Assets, Policy LP 5 Views and Vistas, Policy LP 12 Green Infrastructure, Policy LP 13 Green Belt, Metropolitan Open Land and Local Green Space</p>
14	Mayor of London	<p>Richmond's recognition of the importance of the Royal Botanical Gardens Kew as a World Heritage Site (WHS) is welcome and the WHS Site Management Plans should be used to inform Richmond's plan making process. Policy HC2 of the Intend to Publish London Plan should be noted and Richmond's Local Plan should require development proposals with potential to impact the WHS and its setting be accompanied by Heritage Impact Assessments.</p>
20	Gary Backler, Friends of the River Crane Environment.	<p><u>Heritage</u>: The borough's heritage is to be found not only in its conservation areas, royal parks and listed buildings, but in its historic industrial sites and watercourses. These should be protected and promoted at least as rigorously. This includes for example the formerly industrial landscape of Crane Park and the historic water features in the grounds of Kneller Hall. Note that the whole of the Crane corridor is an area of archaeological importance.</p>

Respondent reference no.	Name / Organisation	Detailed comments
22	Jimmy Wallace, Richmond Athletic Association	<a href="#">See comments below.</a>
23	Peter Willan & Paul Velluet on behalf of Old Deer Park Working Group	See response below, set out in general comments relating to this subject area.
24	Paul Velluet	See response below, set out in general comments relating to this subject area.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	The Direction of Travel says: <i>'The borough's unique and locally distinctive natural, built and historic and cultural environment is highly valued, and we want to protect what is special and improve our areas for residents, businesses and visitors.'</i> We endorse this, especially in relation to Central Richmond, the Riverside and the Green. The Riverside and the terraces are also a place for visitors and residents to relax and enjoy the scenic river Thames. [comments as in Culture section] Central Richmond, the Riverside and the Green all need to be de-cluttered from unnecessary signage and signage needs to be made consistent across the area.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Will be much weaker without Village Plans and the protection will mainly be the fragmented conservation areas. Many of the Conservation Area Statements are too brief, whilst many of the studies are very old. This has been exploited by developers in some cases and thus they all need comprehensive reviews. We feel that Whitton High Street should become a Conservation Area; it is a classic interwar high street with an interesting mix of styles including the work of notable architects. Conservation Areas status would assist in retaining the architectural detailing and replacement (overtime) of inappropriate windows and signage.
28	Alice Shackleton on behalf of The Kew Society	If not, this could be dealt with by SPDs.
31	Tim Catchpole on behalf of MESS	The policies are strong but does the Council have sufficient resources to implement?
42	Jeremy Gill	Again I'm none the wiser from reading the above.
45	Sally Beeson	I don't think they are strong enough but hope they are!
46 (a)	Joan Gibson	I agree with all proposals, but am missing how we control visitor numbers and make sure visitors do not travel to attractions by car. LBRuT need to fix the public transport issues that mean Richmond has the highest percentage of people travelling by car to the Royal Parks (for instance).
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
52	Winston W Taylor	So far so good. But as the paper says a review is necessary to ensure this is the case.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	It is proposed to identify further areas to protect but the borough is currently doing a poor job at protecting these areas currently. The focus should be on finding an efficient way to protect the current ones before looking expanding these areas. Indeed conservations areas, grade II listed building and buildings of township merit in East Twickenham are being completely ignored and current policies bypassed. For example: recycling centre and a bus stop being placed right in front of the only grade II listed building we have in the area. The new Lidl development site completely jars with the character of the area and has bypassed many planning policies despite being a protected area. In planning applications, conservation area policies are being ignored. There is also no budget allocated to maintain these areas. If the borough is trying to expand these, how can this be done in a meaningful way?
68 (a)	Mark Jopling	Need to be more responsive on NDHA
68 (b)	Mark Jopling	Need to be more responsive to NDHA directions and engaging with GLHER and HE on Planning matters
69	Geoff Bond on behalf of Ham and Petersham Association	BTMs can be demolished with impunity without permission it should be made easier to pursue those responsible

Respondent reference no.	Name / Organisation	Detailed comments
<b>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?</b>		
Of respondents who answered the question: 4 said yes, 18 said no and 0 said don't know [16 did not answer the question]		
22	Jimmy Wallace, Richmond Athletic Association	In relation to heritage, we welcome the proactive approach the borough suggests taking to identify opportunities for development that can result in improvements to the character and appearance of a conservation area, and more generally, the approach of ensuring that the emerging Local Plan policies will follow the approach outlined in National guidance as it relates to the requirement for development proposals to be assessed against the requirement to seek to avoid harm to heritage assets and the justification for the proposal. We are also in agreement with the suggested policy approach whereby the borough would actively identify opportunities for development and / or redevelopment where these can result in improvements to the character and appearance of existing conservation areas. We think this approach could also be extended in relation to other heritage assets such as listed buildings and parks.
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	The Group questions the proposal for the Council to actively identify opportunities for development or redevelopment within conservation areas, such as the Old Deer Park Conservation Area, simply on the basis that 'where these can result in improvements to the character or appearance of conservation areas'. Such an approach is simplistic and premature, in the absence of a coherent, evidence-based study of each conservation area (using existing or updated Conservation Area Studies) identifying those buildings or features which detract from the character, appearance or significance of the conservation area, and where their development, subject to scale and design could serve to enhance the character and/or appearance of the area and sustain its significance.
24	Paul Velluet	I would question the proposal for the Council to actively identify opportunities for development or redevelopment within conservation areas, simply on the basis that 'where these can result in improvements to the character or appearance of conservation areas'. Such an approach is simplistic and premature, in the absence of a coherent, evidence-based study of each conservation area (using existing or updated Conservation Area Studies) identifying those buildings or features which detract from the character, appearance or significance of the conservation area, and where their development, subject to scale and design could serve to enhance the character and/or appearance of the area and sustain its significance.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	Central Richmond, the Riverside and the Green are all covered by Conservation Area Policies that protect and seek to enhance their heritage.  We do not believe there is any case for relaxing the constraints on development in Central Richmond, the Riverside or the Green.  The Green is an historic park of national significance with many listed buildings, and it is essential that it is not commercialised and that it remains distinct from its urban neighbour - Central Richmond - joined physically by the passageways from George Street. The Green's paramount use is for visitors and residents to relax and enjoy its relatively peaceful presence and historic surrounds.  We note the Council proposes to review Conservation Areas, saying on page 35 of the Direction of Travel ' <i>particularly where there is pressure as well as opportunity arising out of development proposals, such as in Richmond town centre.</i> ' Apart from the House of Fraser re-development (whose increase in massing and height we continue to strongly oppose) we are not clear what other developments the Council has in mind.
28	Alice Shackleton on behalf of The Kew Society	No. We see no benefit to seeking out such opportunities – a review to update Conservation Area studies is one thing and is useful; but seeking out opportunities for development is a major risk as "improvements" may be subjective and ultimately detract from the CAs.
31	Tim Catchpole on behalf of MESS	Yes but again the Council must have sufficient resources
<b>Are there other opportunities through planning to enhance the cultural offer and widen participation?</b>		
10	Stuart Morgans, Sport England	<a href="#">Please see comments in Section relating to Social Infrastructure.</a>
22	Jimmy Wallace, Richmond Athletic Association	We broadly support the approach outlined towards maintaining and enhancing the borough's culture. We note the identification of Twickenham Stadium and the Stoop (Harlequins) as major attractions for the continued use of the grounds for sports uses. Similarly, the Richmond Athletic Ground also has a current site allocation for ongoing sports use and we consider it to be equally important to the borough's cultural offer. Not only does the facility meet many of the day to day sporting

Respondent reference no.	Name / Organisation	Detailed comments
		needs of the community of all ages, it also hosts a number of important sporting and leisure-based events as outlined in our introduction to this letter. In our view, this highlights the importance of ensuring that facilities such as the Athletic Ground should continue to be identified as being of cultural significance to the borough and appropriate policies drafted to support its enhancement and evolution into a modern sporting and cultural facility of excellence.
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	The Group suggests that there is scope to promote the cultural significance of the Old Deer Park for the benefit of both residents and visitors alike by identifying and celebrating its heritage and ecological interest, parkland character and accessibility as Richmond's 'Other Park'.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<a href="#">See comments on value of cultural offer to Richmond above.</a>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to identify areas in cultural deficit – much like you do with access to public open space. Then you would have more leverage to incorporate things like cinemas or galleries into large projects.
28	Alice Shackleton on behalf of The Kew Society	Possibly although it may be that this is better dealt with through financial assistance to relevant groups than through planning.
36	Tim Catchpole on behalf of MESS	In town centres. <b>[Additional comment in response by email]</b> Not just in town centres but also on major development sites.
41	Anthony Swan	Udney Park site
42	Jeremy Gill	Do you mean encourage more people to go to the theatre for instance? Probably yes.
44	Roger Cutler	Only if you properly listen to people & don't, as now, just ride roughshod over any objections you don't like.
45	Sally Beeson	I think you do a very good job already
46 (a)	Joan Gibson	For point 56. this cannot be used to justify building on green land - especially undisturbed and inaccessible green land
52	Winston W Taylor	The Borough needs more music venues to reflect its history in the R&B/Jazz/Rock area. Planning policy could reflect this and also stop things like the ludicrous threat to the Bulls Head in Barnes several years ago.
53	Richard Woolf on behalf of McDaniel Woolf Architects	We are 'very' fortunate to have such excellent cultural sites within the borough. We should also celebrate great 20th C and 21st C places and spaces, which tend to be over looked.
57	Tom Clarke, Theatres Trust	We are supportive of the plan's approach to widening participation in culture, and that the borough's theatres have been noted. These contribute towards the overall vibrancy of the borough, and the cultural well-being of local people. We would encourage the plan to suggest engagement with the Trust where developments proposing or impacting theatres come forward. Part of encouraging participation is protecting and supporting what already exists. As such the plan should have strong policies protecting existing facilities from loss, as are referenced within the Social and Community Infrastructure section.
58	Michael Atkins, Port of London Authority	Welcome reference in the Direction of Travel document to the Thames Policy area and the need for development proposals within the area to respect and take account of the areas special character.
63	Carol Rawlings	Support for Kew Gardens in order that it can continue its essential botanical research and preservation work and reduce the entrance fee, which disadvantages low income people. Appreciation of the natural world must be encouraged if we are to develop zero carbon plans to meet climate needs but currently the entrance fee is unaffordable for most people.

Respondent reference no.	Name / Organisation	Detailed comments
69	Geoff Bond on behalf of Ham and Petersham Association	A reappraisal of the BTMs of Ham and Petersham as these were missed both in the Neighbourhood plan and the recent reassessment. There is no mention of Other Sites of Nature Importance. Protection from the introduction of urban features including signage into conservation areas should be clearly restricted.
<p><b>Do you agree that the MOL and Green Belt boundary review should also incorporate a review of designated Other Open Land of Townscape Importance?</b></p> <p>Of respondents who answered the question:            14 said yes, 5 said no and 2 don't know            [17 did not answer the question]</p>		
14	Mayor of London	The borough is home to a substantial amount of MOL and to a lesser extent Green Belt. The Mayor is pleased that it is Richmond's intention to provide strong protection against inappropriate development in these areas in accordance with Policies G2 and G3 of the Intend to Publish London Plan. Please note the Secretary of State has issued Directions on Intend to Publish Policies G2 and G3.
17	Hannah Bridges, Spelthorne Borough Council	<p>Spelthorne Borough Council is supportive of Richmond's approach to explore all options to meeting development needs, including the production of a Green Belt review to determine if any areas are not fulfilling their purpose. As mentioned in the consultation document, this will demonstrate at the examination stage that reasonable options have been considered, should exceptional circumstances exist. If land is to be released to help meet development needs, in line with the NPPF 2019 brownfield land and sustainable locations should be prioritised.</p> <p>If the decision is taken to review the Green Belt we would appreciate being notified of any implications for the strategic Green Belt that runs between Spelthorne and Richmond. We feel that it would be beneficial to hold a Duty to Cooperate meeting in due course to discuss Green Belt and other cross boundary issues as both authorities progress Local Plan preparation.</p>
20	Gary Backler, Friends of the River Crane	<p><a href="#">[See earlier comments relating to green infrastructure]</a></p> <p>We note with concern that the Council are; "committed to carrying out a review of existing Green Belt, Metropolitan Open Land and Other Open Land of Townscape Importance to fully inform our spatial strategy and approach to growth and development in the borough." (p39) We are concerned that on this occasion, revised housing targets appear to be regarded as a legitimate test for the existence of "exceptional circumstances." Such an approach would appear to legitimise the challenging of Green Belt/MOL boundaries on any future occasion when housing targets or other development imperatives are adduced.</p> <p>We would oppose any de-designation of Green Belt and any development of Metropolitan Open Land which diminished the overall value, or potential value, of the open space network of the borough and did not, as a minimum, offer a compensating increase in open space quantum and open space protection elsewhere in the borough. We would also oppose any re-designation from Green Belt to Metropolitan Open Land, which would thereby enable development to be brought up to the very boundary of the re-designated space.</p> <p>We believe that any review of Green Belt, MOL and OOLTI should have, as an at least equal purpose, the consideration of how the quality of open spaces with such protections can be improved and managed to increase their public-welfare, environmental and ecological value. We would also like to see at least equal energy injected into a review of the obstacles and severance factors which prevent the physical joining up of current, near-adjacent open spaces of various designations into larger spaces; and of the obstacles to improved pedestrian and cycle connectivity between such open spaces, including land ownership.</p> <p>Our own survey data, assessing the way in which local communities engage with open spaces in the borough, demonstrates quantitatively the extent to which users of an open space seek to "join-up" their visits with visits to adjacent open spaces. This is particularly the case for visits which involve children; whereas other research shows that children in general are reluctant to engage with open spaces. Improving the links between open spaces, and resisting any loss of linkage caused by de-designation and development, is therefore key to engaging children in open spaces. The Council should be concerned about this as a matter for the health of future generations. ("Prevalence of obesity more than doubles between reception and year 6" p56 – "a preventable public health issue" p58).</p>
22	Jimmy Wallace, Richmond Athletic Association	In relation to open land, we support the borough's intention to carry out a borough-wide review of Green Belt and Metropolitan Open Land. This is now also particularly relevant in the context of the Secretary of State's letter to the Mayor of London on 13th March in relation to the 'Intention to Publish version of the London Plan'. Specifically in relation to Green Belt, the Secretary of State has directed amendments to the emerging London Plan which are intended to bring it into line with the NPPF by ensuring there is reference to 'very special circumstances' that would make otherwise harmful development acceptable.

Respondent reference no.	Name / Organisation	Detailed comments
		<p>A second important change that has been directed relates to local plan making where the suggestion changes is that <i>“Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a local plan.”</i> (our emphasis). This wording introduces the ability for Green Belt to be altered, either extended or de-designated. As made clear in the London Plan, the Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt so in this regard, it is entirely appropriate for the borough to carry out a review of such designated open land also.</p> <p>We support the acknowledgement that the reassessment of existing constraints is an important part of the plan process, focusing on whether designated open land still meets its purposes as outlined in the NPPF, London Plan and Local Plan. We agree that it is likely that the majority (but not all) of the existing land that is protected by these designations fulfils the policy requirements and criteria for ongoing designation. However, we do agree with the borough’s suggestion that there is potentially pockets of land that could benefit from a thorough assessment against the relevant policy criteria for designation. We discuss this in greater detail in our commentary on the ‘Call for Sites’ consultation below insofar as believe this applies to elements of the Richmond Athletic Ground site which have already been developed with existing buildings, car parking and hard landscape and as such can be argued as not meeting the necessary policy criteria for ongoing designation. We endorse the borough’s intention to run an open and transparent assessment of such areas of designated open land and the commitment to ongoing consultation both to agree the assessment methodology and in relation to site specific changes that might be suggested.</p> <p>To conclude on open land, we broadly support the policy directions as outlined on p.40 and we look forward to studying the detail of the emerging policies in due course. Similarly, we would like to be involved in the proposed Green Belt / MOL review process and look forward to submitting evidence to justify the partial release of some previously development parcels of the Richmond Athletic Ground site from the designations of protected open land.</p>
23	Peter Willan on behalf of Old Deer Park Working Group	<p><a href="#">[First para following on from comments to the Introduction]</a></p> <p>1.12 However, the Group remains apprehensive that the stated commitment to carrying out a review of existing Green Belt, Metropolitan Open Land and Other Open Land of Townscape Importance (‘to fully inform our spatial strategy and approach to growth and development in the Borough’) to which reference is made on page 39 of the consultation document, and reflected in Questions 11 to 17 of the questionnaire, raises the considerable risk the potential de-designation of many, much valued open spaces of the Borough such as the Old Deer Park, as an unintended consequence of a simplistic search for growth.</p> <p>The Group supports the proposed review of the boundaries of Metropolitan Open Land, but only insofar as it will serve to provide scope for the Council to give proper consideration to adjustments in the boundaries of open land currently designated as MOL to embrace areas presently and anomalously excluded from such designation, such as those in the Old Deer Park – an issue on which the Group has repeatedly pressed in its submissions in response to consultation on the preparation of the present <i>Local Plan</i> and the present <i>Old Deer Park Supplementary Planning Document</i> and in earlier submissions. Copies of the Group’s submissions on this matter are attached. <b>[See Appendix for Group’s earlier submissions]</b></p>
25	Phoebe Quayle	<p>The borough should not use Green Belt, protected Metropolitan Open Land or other valuable open green space for development of any kind. Richmond should instead make more efficient use of land to find space for housing and commerce.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>Need to review all designations to make them as watertight as possible.</p> <p>There are some areas that could be added to MOL such as Hounslow Cemetery (which backs onto Hounslow Heath), Twickenham Cemetery, and the Heathfield Schools playing field.</p> <p>The actual Metropolitan Green Belt within the GLA area is now very thin – and the council should be careful not to confuse this with the home counties green belt. There is a green chain that runs from Whitton Dene, Twickenham Stoop, Kneller Gardens, Lincoln Avenue that acts as green belt separating the historical boundaries of Whitton from the rest of Twickenham. We feel this important ‘break’ in development should be more formally recognised and not just seen as part of the Crane Valley.</p>
32	Mark Jopling on behalf of UPPFT	<p>The Trust makes the following comments on the "Direction of Travel":</p> <ul style="list-style-type: none"> <li>• Upgrade all LBRUT OOLTI locations to MOL, no need for LBRUT to have a separate local designation for protecting green space.</li> <li>• Protect all green space from inappropriate buildings in such strong terms as to dissuade all speculative schemes on green space</li> </ul>

Respondent reference no.	Name / Organisation	Detailed comments
35	Alice Roberts, CPRE London	<p>CPRE London is a membership-based campaigning charity concerned with protecting and enhancing London's Green Belt, Metropolitan Open Land, parks, green spaces and green infrastructure, and achieving compact, green, urban communities to help prevent low-carbon sprawling development in the countryside.</p> <p><b>Green Belt and MOL Sites which are designated with the strongest protection in planning policy should not be allocated for development. Releasing and developing protected land neither necessary nor desirable.</b> The Green Belt to the east of the borough is vital to ensure London does not sprawl into open countryside and so Londoners do not have to live with the devastating impact of urban sprawl i.e. high transport and energy costs, congestion and pollution.</p> <p>MOL is a strategic asset for all of London not just Richmond upon Thames residents. Furthermore, it is vital to ensure Londoners have access to open space and as an ecological asset delivering ecosystem services like urban cooling and water management; as well as providing vital habitat for diverse species.</p> <ul style="list-style-type: none"> <li>Green Belt / MOL reviews should only be conducted to assess whether the land meets the purposes and should not be used as a way to identify land for development.</li> <li>Developments in Green Belt are high-carbon, car-dependent and rarely affordable (according to CPRE evidence).</li> <li>There are clear alternatives for locating development within the borough – please see Annex 1 where we have suggested a number of large sites which could be redeveloped for residential, commercial or mixed-use neighbourhoods.</li> </ul>
37	John Waxman on behalf of Crane Valley Partnership	The review of Green Belt, Metropolitan Land and Other Open Land of Townscape Importance linked with Theme 5 is concerning if there is an underlying risk that this could result in a net loss of green space and/or local shortages of wildlife refuges. The commitment to take a 'transparent approach' to that review is therefore welcome.
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	<ul style="list-style-type: none"> <li>The HPNF are concerned at the prospect of the review of MOL and OOLTI, which forms such a major role in Ham and Petersham and is its defining characteristic. Whilst there is justification for the review, H&amp;P with its limited connectivity is not appropriate for major development which we have noted above should be located in areas with good public transport and sustainable transport infrastructure. There has been progress on some of the infill sites which were identified in the NP, for example at Cave Road/Riverside Drive, Craig Road and Maguire Drive/Dukes Avenue, and that is where attention should continue to be directed.</li> <li>Nibbling away at designated protected areas would undermine public confidence in the strongly supported HPNP. For example the proposed loss of a strip of St Richards School Playing Fields with the apparent presumption that this could be simply compensated for by the provision of a MUGA would, we believe, contravene both the loss of OOLTI open space and the protection of character policies in the HPNP. There are lots of positive policy directions for improving green spaces and enhancing biodiversity which we can support, but not the loss of designated areas.</li> </ul>
42	Jeremy Gill	What on earth does that mean?
44	Roger Cutler	It will only be used as an excuse to bring in other unpopular measures.
46 (a)	Joan Gibson	You should also stop seeing MOL as somewhere you can build on
46 (b)	Joan Gibson	MOL review must designate the whole of Heathfield Rec as MOL (including any extensions), and change the area to parkland.
52	Winston W Taylor	And why not?
53	Richard Woolf on behalf of McDaniel Woolf Architects	The definition of ' development ' in respect to open land is vague. We need management and conservation strategies for our open land and should look to the wonderful work by Thames Landscape Strategy and along the River Craine as being first rate examples of how to conserve open land and ensure it has meaning and purpose. We suffer in this borough with an unhelpful view that doing ' nothing ' is the best option. It is exactly the opposite. We must take our open land in our hands and maintain it , conserve it and make use of it. Every square inch of this borough has evolved.
63	Carol Rawlings	The green belt and other open land should be sacrosanct.
68 (a)	Mark Jopling	OOLTI is local designation, why isnt all OOLTI upgraded to MOL by default ?
68 (b)	Mark Jopling	OOLTI should by default re-classified at MOL, no need for a separate local classification
69	Geoff Bond on behalf of Ham and Petersham Association	this should not include very recent OOLTI designations added in the last plan, of which there are very few. These were only ratified after legal challenge earlier this year. It would seem odd to change these at this stage when it has been so vigorously and recently investigated.
<b>Are there any sites that you would like to be identified for designation as 'Local Green Space'?</b>		

Respondent reference no.	Name / Organisation	Detailed comments
9	Shirley Meaker	lets hope udney park planning is reviewed by an intelligent body this time affordable housing is desperately needed as is the doctors surgery too much time has been wasted toing and froing green belt rubbish there is still plenty of playing field left for the schools as for residents thinking it will spoil their view hard luck were in comfortable houses plenty are not do the right thing for gods sake and let the plan go ahead
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The triangle of grass on the Woodlawn Estate – at the junction of Lyndhurst and Chiltern Avenue could be turned into a pocket park. We also request that public open space designation is expanded to cover all of Heathfield Recreation Ground. There is a strip next to Heathfield School that is not covered.
31	Tim Catchpole on behalf of MESS	Yes, the Stag Brewery Playing Fields.
45	Sally Beeson	Udney Park Playing Fields Langham Road open space River towpaths and open space leading down to the Thames
46 (a)	Joan Gibson	Heathfield Recreation ground and it's future extension should have the highest level of protection you can give it - not all the site is designated MOL at the moment. This to guarantee the space in one of the poorest areas of Richmond with the most ill health and to ensure this land is NOT lost to local schools wanting to expand onto it. This land needs to be for the whole community.
47	Trevor Rowntree	I think Crane Park and the Shot Tower should be designated as a 'Local Green Space' and developed for the community
50	John O'Brien	Westerly Ware, Pensford Field, North Sheen Rec, Raleigh Road rec.
51	Su Bonfanti	I want to nominate Cambridge Gardens and Warren Gardens for designation as a Local Green Space, which holds particular significance and value to the local community. It is the only green space in our network of streets on the south of Richmond Road. It is the only remnant of one of the largest riverside estates in Twickenham belonging to Cambridge House, originally a Jacobean mansion standing on the east of the current Cambridge Road. It is therefore part of the chain of green spaces originally associated with important riverside estates from Syon House up stream to Ham House. Given its location, it also forms part of the amenity of Richmond Riverside, preserving open views on both sides of Richmond Bridge, as well as providing leisure facilities for local people. And Warren Gardens is the location of the memorial to the Belgian refugee community who lived in the area in World War
52	Winston W Taylor	Udney Park Playing Fields now have this status. I am not aware at this stage of any other sites.
53	Richard Woolf on behalf of McDaniel Woolf Architects	No
63	Carol Rawlings	Ham Village Green should be included in the list of designated village greens.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We want to nominate Cambridge Gardens and Warren Gardens for designation as a Local Green Space, which holds particular significance and value to the local community. It is the only green space in our network of streets on the south of Richmond Road. It is the only remnant of one of the largest riverside estates in Twickenham belonging to Cambridge House, originally a Jacobean mansion standing on the east of the current Cambridge Road. It is therefore part of the chain of green spaces originally associated with important riverside estates from Syon House up stream to Ham House. Given its location, it also forms part of the amenity of Richmond Riverside, preserving open views on both sides of Richmond Bridge, as well as providing leisure facilities for local people. And Warren Gardens is the location of the memorial to the Belgian refugee community who lived in the area in World War
68 (a)	Mark Jopling	The Council should have a LGS Policy and encourage communities to nominate sites. Likewise use the Asset of Community Value legislation where appropriate
68 (b)	Mark Jopling	The Borough through Village Planning should encourage LGS and ACV applications from the community. Both of these relatively new designations were missing in the original 2018 Local Plan consultations.
69	Geoff Bond on behalf of Ham and Petersham Association	Ham Library garden
<b>General comments relating to this topic area</b>		

Respondent reference no.	Name / Organisation	Detailed comments
14	Mayor of London	Richmond should ensure that its strategic and local views are protected in accordance with Policy HC3 of the Intend to Publish London Plan. Table 7.1 of the Intend to Publish London Plan identifies the King Henry VIII's Mound to St Paul's Cathedral linear view as a protected vista and this should be preserved by ensuring that it is clearly illustrated on maps and the borough's policies map so that it can be identified by developers and officers to enable the effective management of development in and around the view. The view should be managed by following the principles of Policy HC4 of the Intend to Publish London Plan. The importance of 3-D modelling through images and/or software should be noted as a valuable tool in this regard.
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	In responding to questions 54, 55, 56, 57, 58 and 59 in relation to 'Heritage', 'Culture' and 'Green infrastructure and protecting open land', the Group can see no benefit or justification in seeking to amend, let alone dilute, the existing policies for the protection of local character, heritage assets (including listed buildings, conservation area and Registered Historic Parks and Gardens), views and vistas, the Royal Botanic Gardens Kew World Heritage Site, Metropolitan Open Land, trees, woodlands and landscape, social and community infrastructure, Public Open Space, Allotments, contained in the presently adopted <i>Local Plan</i> .
24	Paul Velluet	In responding to questions 54, 55, 56, 57, 58 and 59 in relation to 'Heritage', 'Culture' and 'Green infrastructure and protecting open land', I can see no benefit or justification in seeking to amend, let alone dilute, the existing policies for the protection of local character, heritage assets (including listed buildings, conservation area and Registered Historic Parks and Gardens), views and vistas, the Royal Botanic Gardens Kew World Heritage Site, Metropolitan Open Land, trees, woodlands and landscape, social and community infrastructure, Public Open Space, Allotments, contained in the presently adopted <i>Local Plan</i> .
29	Richmond Cycling Campaign	P36 (culture, open land, etc.) We would like all considerations in this area to include how people arrive at cultural destinations. For example, on match days at Twickenham, we should have a wider strategy that prioritises those who arrive by foot, by bike and by public transport. As a general rule, it should never be easier or more convenient to drive to our cultural destinations compared to walk/cycle/public transport options, and this should be embedded in policy. We would like to see plans for each of our cultural destinations which consider how people arrive there, capacity, etc., with planning for safe places for bike parking, and appropriate access for those who still need a motorised vehicle (for example blue badge holders). P40 uses the phrase "well served by public transport". We very much welcome this, but want to emphasise that it should specifically include walking and cycling access as well.
<b>Increasing biodiversity and the quality of our green spaces, and greening the borough</b>		
<b>Do you agree with the proposed policy directions?</b>		
Of respondents who answered the question: 20 said yes, 1 said no and 2 said don't know [15 did not answer the question]		
20	Gary Backler, Friends of the River Crane Environment.	FORCE welcomes the inclusion of this theme, and its prioritisation. The Local Plan should recognise (missing from pp41-42) the contribution that improvement to the borough's river channels and wetlands can make to tackling the climate emergency. We believe that all development proposals should carry a <i>mandatory</i> requirement to "enhance green spaces and green features" – elsewhere in the borough if such enhancement proves undeliverable on the site of the development. The "if possible" get-out (p42) should be removed. We would welcome the Council's "implementing a biodiversity net gain imperative" for all developments (p43). We welcome a review "identifying potential new SINC's for designation" (p43), and would be pleased to work with the Council to address obstacles to new such designations. We also support the proposal to customise the Urban Greening Factor model to LBRuT-specific criteria. (p44)  The LB Richmond Biodiversity Action Plan is a document of key value and importance to the recognition and protection of the diverse habitats and species of the borough. It was completely updated in 2019 and is an ongoing collaborative enterprise with contributions from the council, community and private partners. The BAP needs to be adopted as a supplementary planning document for the plan and the values and targets of the BAP need to be integrated into the broader planning policy of the borough through the plan.
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	In responding to questions 61 and 53 in relation to 'Increasing biodiversity and the quality of our green spaces and greening the borough', the Group supports the action points set on page 44 of the consultation document insofar as these are consistent with or simply amplify existing policies in the <i>Local Plan</i> . However, the Group can see no particular benefit or justification in seeking to amend the existing policies in the present <i>Local Plan</i> for the protection of designated sites and other areas of importance for biodiversity conservation; for safeguarding protected species and priority species, including those listed in local biodiversity action plans; for

Respondent reference no.	Name / Organisation	Detailed comments
		retaining and protecting existing trees; and for protecting green and open spaces, contained in the presently adopted <i>Local Plan</i> unless further refinement of those policies cannot be more effectively or speedily delivered through the preparation and adoption of one or more supplementary planning documents.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	No mention of protecting existing green verges or promoting reinstatement. There is the potential of uncapping miles of tarmac verges and reducing pressure on drains. A freedom of information request in 2019 showed that the cost of mowing the grass was calculated the same way as parks – on a square meter basis. Many of our street trees are suffering because they are surrounded by tarmac – and this cause stress, and results in shorter lifespans compared to trees planted in parks. In the height of droughts this results in the release of large amounts of VOCs – and is thought by some scientific papers to greatly add to smog, please see the following links for further information <a href="https://www.sciencemag.org/news/2019/04/drought-not-just-about-water-it-affects-air-pollution-too">https://www.sciencemag.org/news/2019/04/drought-not-just-about-water-it-affects-air-pollution-too</a> <a href="https://www.frontiersin.org/articles/10.3389/ffgc.2019.00050/full">https://www.frontiersin.org/articles/10.3389/ffgc.2019.00050/full</a>
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	HPNF support the 'policy direction' to "Continue to ensure that the impact of large new development is assessed, so that the impact of additional burdens on existing facilities is mitigated", and look forward to this principle being applied and implemented in the redevelopment proposals for Ham Close.
42	Jeremy Gill	Self-evident
46 (a) (b)	Joan Gibson	I worry in this section that Richmond consider green areas which are not accessible by the public as less important than those our many visitors are degrading. You are justifying these can be built on. This attitude needs to stop – land which is dark and undisturbed is more valuable to wildlife than accessible areas. This is the subject of the climate emergency which explains how much wildlife we are losing in the UK and Globally, and you quote in the next section. The Local plan must reflect the climate emergency which has triggered this consultation.
52	Winston W Taylor	Broadly
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We support the proposed policy directions, including developing a local Urban Greening Factor model, which relates to the specific issues here. We also support the expectation that all development should make a positive contribution; if small developments are let off the hook, that will cover much of happens here and it will be a big opportunity missed.
68 (a)	Mark Jopling	Yes though greater protection needed for grass Playing Fields. The Playing Pitch Strategy is a critical Planning document that speculators seek to exploit. Community sports clubs will be strained financially by the CV-19 impact, the Borough must do everything possible to dissuade speculators from trying to buy up distressed sports clubs.
69	Geoff Bond on behalf of Ham and Petersham Association	It is concerning that very recent OSNIs should be reviewed having only very recently been added and vigorously examined.
<b>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?</b>		
Of respondents who answered the question: 21 said yes, 2 said no and 1 don't know [14 did not answer the question]		
22	Jimmy Wallace, Richmond Athletic Association	Biodiversity: We support many of the proposed policy directions as outlined on p. 44. Specifically given the functions of the Richmond Athletic Ground, we support the intention to have policy which encourages enhanced green and open spaces to provide a wider range of benefits for residents including improved public access and recreational facilities.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to recognise railway lines as habitat corridors and make them SINCS – in the way Hounslow Council has done. We note the Biodiversity Action Plan map misses out three large 'bat' sites in Whitton; Crane Park, Hounslow Heath, and Kneller Hall.

Respondent reference no.	Name / Organisation	Detailed comments
37	John Waxman on behalf of Crane Valley Partnership	<p>The Crane Valley Partnership (CVP) is an unincorporated association of public, private and third sector organisations that aims to:</p> <ul style="list-style-type: none"> <li>• raise awareness and support action for conservation, restoration and new approaches to design and management of the river valley</li> <li>• help communities take a sustainable approach to managing and improving the River Crane and its tributaries</li> <li>• improve and protect the biodiversity of the area</li> <li>• maximise the use of the river corridor as a resource for healthier living and educational activities for local people</li> <li>• promote connectivity along the river corridor</li> </ul> <p>For more information on CVP please see: <a href="http://www.cranevalley.org.uk">www.cranevalley.org.uk</a></p> <p>Please note that London Borough of Richmond upon Thames is a member of CVP. I should also highlight that my comments do not present the collective view of the various partner organisations within CVP. Members of CVP will have their own perspectives on this consultation and will submit their own responses accordingly if they wish to engage in the consultation process.</p> <p>I have seen the detailed response to the consultation from Friends of the River Crane Environment (FORCE). I fully support and endorse the comments within that considered response [<b>See respondent number 20</b>]. Given FORCE's extensive local knowledge and strong community focus I would suggest that its views should carry considerable weight within this consultation.</p> <p>I will however take the opportunity to make some reinforcing points myself: LBRuT has declared a 'Climate Emergency' and must now act accordingly by ensuring that Local Plan policies are <u>fully aligned</u> with that declaration. There should be no anomalies or contradictions in the Borough's position. In this context, the Local Plan must recognise that the River Crane, the Lower Duke of Northumberland's River, the Whitton Brook and the open spaces along the river corridors are extremely valuable green infrastructure assets that need to be protected and enhanced so they can fully play their part in helping to mitigate the impacts of climate change.</p>
42	Jeremy Gill	How much did you pay people to write this?
44	Roger Cutler	The word "biodiversity" is made up & meaningless.
46 (a) (b)	Joan Gibson	<p>You are also using MOL and green land as cheap areas to build on. This has to stop – as listed before there is a huge amount of “efficient” rebuilding you can do on brown field sites to achieve building targets.</p> <p>The Local plan must state only the many brown field sites can be built on.</p>
46 (b)	Joan Gibson	<p><a href="#">See also comments in section 'Increasing Biodiversity'</a></p> <p>Hedges are often more valuable as wildlife habitat and in reducing pollution. Along with trees you need to promote and plant hedges too. They are much more effective and sustainable than green walls which often never happen (Twickenham School plan had green walls which were never planted, and LBRuT have done nothing about). You need to only agree planning permission when the development is going to deliver green infrastructure that works and LBRuT will enforce.</p> <p>New developments should have a 30% tree canopy, very little grass lawn (could use alternative planting like yarrow which is more valuable to wildlife), hedges for borders (rather than fences), insect walls, and bird habitats.</p> <p>There is no justification for the “unavoidable” loss of wildlife habitat and the assumption that developments can be justified when removing habitat must be removed from the local plan.</p> <p>Undisturbed, inaccessible green areas must be given a higher protection on the bases of their value to wildlife.</p>
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough to help biodiversity.
50	John O'Brien	Include Pensford Field in this plan

Respondent reference no.	Name / Organisation	Detailed comments
58	Michael Atkins on behalf of Port of London Authority	Support the intention to enhance green and open spaces to provide a wider benefit for residents, including improved public access for all.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We would like to see more tangible ways for urban greening to be included in new developments sites and local town centres with the use of green walls and equivalent of CityTree
68 (a)	Mark Jopling	Needs to be stronger presumption against development of green space to deter the speculators who waste massive public resources trying to challenge the Local Plan
68 (b)	Mark Jopling	Should be much stronger on protecting green space and playing fields so any speculators don't try and fight the Council. Sports clubs will be vulnerable post CV-19 and the "vultures" may circle if they building on pitches in remotely possible
69	Geoff Bond on behalf of Ham and Petersham Association	Key here is preserving and developing green corridors
<b>Do you agree that we should develop our own Urban Greening Factor model rather than relying on the generic London-wide model?</b>		
Of respondents who answered the question: 13 said yes, 2 said no and 5 don't know [18 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	We have an above average percentage green space because of Richmond Parks, Bushey Park and Hampton Court – and this may result in green models designed for the more urban central London having perverse results.
44	Roger Cutler	Provided you listen to people properly rather than put in what you feel they need.
45	Sally Beeson	Most definitely!
46 (a)	Joan Gibson	Absolutely not - you can adapt the London wide model but rewriting will miss points and is costly, and slow.
46 (b)	Joan Gibson	I do not agree you should develop your own greening model rather than using the London wide one as this is just wasting time and increasing cost. You should adapt the London wide model and make sure any adaptations work across borough boundaries.
51	Su Bonfanti	Your proposed policy directions, including developing a local Urban Greening Factor model, which relates to the specific issues here, sounds right to me. I support the expectation that all development should make a positive contribution; if small developments are let off the hook, that will cover much of happens here and it will be a big opportunity missed.
52	Winston W Taylor	Tend to yes but I would have to do more research. I have not seen the London-wide model
63	Carol Rawlings	Roof gardens and green walls should be developed.
68 (a)	Mark Jopling	Richmond should be leading London though the models should be London-wide
68 (b)	Mark Jopling	Lead London-wide not go-it-alone
<b>Do you agree with the introduction of the biodiversity net gain requirement?</b>		
Of respondents who answered the question: 17 said yes, 2 said no and 4 don't know [15 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to ensure green roofs are not over relied upon (they can turn out to be low value sedum matts) and that any wildlife corridors are wide, robust, and little light penetration.

Respondent reference no.	Name / Organisation	Detailed comments
44	Roger Cutler	Totally meaningless phrase.
46 (a) (b)	Joan Gibson	LBRuT are not trusted to protect our green land as you have already demonstrated you do not ensure all viable alternatives are used before agreeing to build on MOL for the THS development. I see nothing in this update or previous local plans which demonstrates you will protect our green infrastructure in the manner you think you are doing so already. The wording and agreements to protect green land with GLA and the government need to be stronger, and you need to commit to standing your ground rather than being afraid someone will overturn your planning decision. I am missing what you will do to ensure our many visitors travel to green sites without using cars, limit their damage to the green site, and desist from using the park as a car through route.
46 (b)	Joan Gibson	I totally agree on biodiversity net gain requirements. This should be assessed by independent LBRuT staff and not by consultants employed by the developer who will not get repeat business unless they prove what the developer wants to deliver. Currently LBRuT take the word of Developers when assessing impact on air quality, biodiversity and travel arrangements. This is (it is happening now) leading to developments which increase car traffic and decrease air quality.  How you do this is to specify as a minimum: 30% tree canopy, hedges for fences, lawn areas to be yarrow (or some such plant), green roofs, bird and bat boxes, stag loggeries, insect walls, bath and shower water collection for watering, hard landscaping to be porous, car free developments (car park area can be used for wildlife).
52	Winston W Taylor	Not enough time to consider
53	Richard Woolf on behalf of McDaniel Woolf Architects	Before you define net gain , you have to establish a net loss. This can only be done if you survey what exists. We don't have any up to date survey information on much of the boroughs woodland and open spaces.
63	Carol Rawlings	Roof gardens and green walls.
<b>General comments relating to this topic area</b>		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<b>Green Infrastructure &amp; Protecting Open Land</b> The Green and the Riverside are key MOL assets and must be protected from development. In recent years small portions of MOL on the terraces of the Riverside have been occupied by a restaurant. This should not be repeated. There is pressure to commercialise the Riverside and this must be resisted. Access to the Old Deer Park from Richmond is important and needs recognition as such.  <b>Increasing biodiversity and the quality of our green spaces, and greening the borough</b> It is important that the grass surface of the Green and the grass terraces by the Riverside are supported and not compromised. It is important that the trees around the Green and along the Riverside and elsewhere in Central Richmond are properly maintained. It is important the wild life on the Riverside and elsewhere in gardens is protected. We believe the policies in the current Local Plan cover the biodiversity issues adequately and if further amplification is required we would suggest that it could be dealt with by subsidiary planning tools.
29	Richmond Cycling Campaign	P44 - with regard to trees on our pavements, we draw the council's attention to recent discussions on how tree roots can damage pavements and make them impassable for those using (for example) walking frames or mobility scooters or chairs.  We would like to see policy specify that pavement space will not be given to trees in this way, and that: a) Any new development will place trees into the space usually occupied by car parking, leaving clear, unobstructed pavements. b) A programme to reallocate car parking spaces to trees - using buildouts as appropriate - whenever trees are replaced or planted.
46 (b)	Joan Gibson	Need to stop people paving over their gardens. Their gardens can include porous car parking, and planting to ensure no net loss of biodiversity or water absorption.  Pavements around new developments (and roll this out to the whole of Richmond) must include hedges to protect against pollution and flooding, and improve biodiversity.

Respondent reference no.	Name / Organisation	Detailed comments
		Additionally, LBRuT can green the borough by running a campaign to get gardens, patios etc. greened up. Tell people how to do it (even in pots), what to plant (native shrubs etc.) and how it will help their personal air quality.
<b>Improving design, delivering beautiful buildings and high-quality places</b>		
<b>Do you agree with the proposed policy directions?</b>		
Of respondents who answered the question: 17 said yes, 4 said no and 1 don't know [16 did not answer the question]		
22	Jimmy Wallace, Richmond Athletic Association	We acknowledge the various suggested policies directions for improving design and delivering high quality buildings and places. We look forward to reviewing the detailed policy wording as it emerges and we recognise the requirement for high quality design of new buildings and places to contribute to the beauty and character of the borough.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The council is planning on removing the Whitton & Heathfield Village Plan which will reduce the protection of the area against inappropriate development, because most of Whitton was developed in the inter-war years and has a very small percentage of properties protected by formal designations. Most of the Councils 'heritage' policies value Victorian and earlier neighbourhoods higher than interwar ones – and mechanisms like conservation areas won't be much use in areas like Whitton.
28	Alice Shackleton on behalf of The Kew Society	The explanation with the policy directions seems to indicate that there is already a substantive and substantial volume of appropriate policy, whether in the adopted Local Plan or in SPDs or other documents and acknowledges the value of these. This does not indicate a need for a review and new Local Plan but rather refining what currently exists. For instance, a tighter policy on siting of tall and taller buildings to protect the character of some town centres (e.g. Richmond) and out of town areas (e.g. Homebase, Manor Road) and potentially retail parks (such as Kew Retail Park) is needed.
42	Jeremy Gill	Got more important things to worry about and so should you.
44	Roger Cutler	Your plans for Twickenham Riverside are definitely not beautiful.
46 (a)	Joan Gibson	I agree with what you are doing and think LBRuT is good at ensuring our borough keeps its character. Aging population – possible to build high quality sheltered / monitored accommodation to entice people out of their large homes?
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
53	Richard Woolf on behalf of McDaniel Woolf Architects	I am very uncomfortable with a Richmond Borough Design Guide. The emphasis within this section is on ' history ' being the key issue, not quality . I am very uneasy with the current Governments direction of travel towards Classical Architecture being favoured over other forms of architectural design and even more worried that developments which express their facades in a ' classical ' manner will be granted planning in the mistaken view that they are more ' beautiful ' that others.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We support the preparation of a design guide for the borough, reflecting specific setting, character and history of different neighbourhoods. We would like any guide to recognise the importance of Richmond Road in East Twickenham as an approach to Richmond Bridge, one of the most important structures in the borough. We support the idea of embedding the Richmond Design Review that further. Although it seems unlikely that schemes in our area would be big enough to qualify, we hope there would be a trickle down from larger schemes, both in signalling to developers what is acceptable and in strengthening the hand of the Planning Committee.
<b>How should the Urban Design Study identify areas for change and locations where tall buildings and/or high density development may be appropriate?</b>		
20	Gary Backler, Friends of the River Crane Environment.	<p>FORCE welcomes the objective that “new buildings are well designed and contribute positively to the character of the townscape,” but we emphasise that new buildings must also contribute positively to the maintenance and improvement of the character of open spaces too: namely by reducing massing and visual intrusion into open spaces and, in particular, along the green corridors associated banks of the River Crane and the Duke of Northumberland’s River. FORCE believes that no such locations are suitable to accommodate tall buildings, and would welcome assurances that these would not be considered suitable for such locations by the application of the proposed “Urban Design Study” principles. (p47)</p> <p>We support “effective place making strategies” in principle. We believe that the borough’s open spaces are a key feature of “place” in the borough, for both residents and visitors. Our usage surveys, undertaken over seven years and at multiple locations along the River Crane and DNR, provide considerable insight into the connection of residents and visitors with these places; and we would be pleased to share our insights. We believe that these usage surveys are a critical insight into the current</p>

Respondent reference no.	Name / Organisation	Detailed comments
		public usage of open spaces, and the potential enhancement of this usage, and we would expect the council to be undertaking comparable surveys across the borough to inform its policies and strategies.
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	In responding to questions 66, 67, 68 and 69, in relation to improving design, delivering beautiful buildings and high quality places, the Group can see no particular benefit or justification in seeking to amend the existing policies relating to local character and design quality, building heights, designated heritage assets, non-designated heritage assets and views and vistas, contained in the presently adopted <i>Local Plan</i> . The Group suggests that any further refinement of those policies could be effected by the preparation and adoption of one or more Supplementary Planning Documents, or by appropriate amendment to the published Borough-wide <i>Sustainable Urban Development Study</i> which already sets out an unduly relaxed and highly questionable approach to the development of 'tall buildings' close to Richmond Station and 'taller buildings' in the centre of Richmond. Insofar as reviewing and amending the existing <i>Study</i> , the Group urges that the potentially harmful impact of the development of 'tall' and 'taller' buildings on the Old Deer Park Conservation Area and its setting and on the adjacent part of the Richmond Riverside Conservation Area (which embraces part of the Old Deer Park) should be a major consideration.
24	Paul Velluet	In responding to questions 66, 67, 68 and 69, in relation to improving design, delivering beautiful buildings and high quality places, I can see no particular benefit or justification in seeking to amend the existing policies relating to local character and design quality, building heights, designated heritage assets, non-designated heritage assets and views and vistas, contained in the presently adopted <i>Local Plan</i> . I would suggest that any further refinement of those policies could be effected by the preparation and adoption of one or more <i>Supplementary Planning Documents</i> , or by appropriate amendment to the published Borough-wide <i>Sustainable Urban Development Study</i> which already sets out an unduly relaxed and highly questionable approach to the development of 'tall buildings' close to Richmond Station and 'taller buildings' in the centre of Richmond. Insofar as reviewing and amending the existing <i>Study</i> , I would urge that the potentially harmful impact of the development of 'tall' and 'taller' buildings on designated conservation areas and their settings and should be a major consideration.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<a href="#">See also comments in Housing section.</a> We oppose tall buildings and high density development in Central Richmond. At page 47 of the Direction of Travel document, it is stated that ' <i>We are considering undertaking an Urban Design Study which identifies local context and the locations in the Borough which have the capacity of development as well as their suitability for tall buildings</i> '. It remains unclear how such a proposed study relates to the Council's Borough-wide Sustainable Urban Development Study of September, 2008 and to its conclusions, to which reference is made at paragraph 4.2.2. in the present Local Plan. We very much hope that in reviewing the 2008 Study every opportunity will be taken to challenge the identification of the area around Richmond Station as offering 'the potential for "tall buildings"' and 'the centres of Richmond and Twickenham... where "taller" buildings may be appropriate'. ('Taller' buildings being defined as those being significantly taller than the neighbouring buildings, but less than 18 metres in height (below six storeys) and 'tall' buildings being defined as buildings of 18 metres in height or higher). We would suggest that nowhere within the boundary of the Central Richmond offers the scope for such developments.
28	Alice Shackleton on behalf of The Kew Society	Again, we ask why this is needed and why is the Council looking, apparently, to facilitate tall buildings and high density development (presumably of the sort provided by high rise blocks as in the Homebase, Manor Road, development). Such aspect of the Study must go in hand with identifying/specifying further areas where this is <u>not</u> appropriate, as present local policy LP2 seeks.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The main factor here is how connected they are to frequent public transport that can cope with extra passengers. It's also important to consider the timings of last services too. For example, the last train to Whitton from London Waterloo is known at the Cinderella Service as it leaves at 23.58 – which requires you to leave social gatherings in town earlier than anyone else. Maybe the council need to assess each town and look at the limitations – such time it takes to get to central London, spare capacity on the trains, bus routes or lack off, as this will help show what needs to be done to unlock the potential of areas.
31	Tim Catchpole on behalf of MESS	By focusing on the existing retail parks. Tall buildings are not appropriate in this borough.
41	Anthony Swan	Don't know. Tall building not so appropriate in this Borough
42	Jeremy Gill	They aren't.
44	Roger Cutler	LISTEN to the views of local people rather than profit-hungry developers, dubious quangos & out-of-the-area people who always get consulted but don't have to live with the end-result.
45	Sally Beeson	Only allow quality building to proceed which highlights our local character.

Respondent reference no.	Name / Organisation	Detailed comments
46 (a)	Joan Gibson	Places you can build more high rise are above large supermarkets – Rugby Road, Hampton and business park buildings etc. etc. Town centres such as Twickenham.
49	Margaret Edwards	The issue with many tall buildings is that they create wind tunnels at street level. This is already noticeable outside the new Twickenham station concourse. It makes it less attractive as a walking route and dangerous for less able people. Tall buildings also screen out sunshine and reduce daylight at street level - to be avoided in town centres and where other housing is low level. High density can work in town centres where access to facilities and green space is good.
52	Winston W Taylor	I would need to talk to planners, architects etc to answer this. Perhaps a good exercise for a degree level student in town planning or architecture to research.
53	Richard Woolf on behalf of McDaniel Woolf Architects	As Richmond continues to reject higher density construction I'm afraid we'll have to have this policy dictated to us by the Inspectorate and the Major of London.
55	Jon Rowles	The most important factor will be access to train stations with a metro turn up and go service.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Conservation areas or areas with grade II listed buildings should be excluded. Also, where tall buildings might jar a view of particular merit.
69	Geoff Bond on behalf of Ham and Petersham Association	Where they fit the local character of the wider area and the related infrastructure (transport, schools and healthcare) will not be overloaded.
<b>Should design review be embedded as one of the policy tools to inform determination of planning applications?</b>		
Of respondents who answered the question: 21 said yes, 0 said no and 2 don't know [15 did not answer the question]		
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	In relation to the proposed increase in the use of design review and its potential involvement in proposed developments in and around the Old Deer Park, the Group believes this should no longer be a process carried on 'behind closed doors'. Instead, it should be undertaken on a much more open and transparent basis. Whilst planning officers and members of the applicants' team are allowed to attend and participate in dialogue with members of the Richmond Design Review Panel, others, with the exception of local councillors who may have a particular interest in the proposals are not allowed to attend. Such a situation appears to be in conflict with the role of the Review Panel in the public interest. It is noted that unlike the Council's former Conservation Areas Advisory Committee, the majority of the members serving on the Panel have no direct association with Richmond, nor have any declared special knowledge or understanding of its history, architecture, landscape and character, let alone, its conservation areas. Such a situation would suggest that the scope for the Panel to contribute usefully and effectively to the planning process in relation to proposed developments in the Old Deer Park and nearby may be limited. For many years right up until the present, the real problem in relation to issues such as the design of new development, the design of alterations and extensions to existing buildings and the design of urban spaces, has been the tendency of the Council in its decision-making to approve proposals that are demonstrably inconsistent with its own adopted policies, guidance and planning-briefs, as so clearly reflected in the recent decisions to approve the proposals for the Stag Brewery Development at Mortlake – without consultation with the Council's own Design Review Panel – and the proposals for the House of Fraser Development in Richmond.
24	Paul Velluet	In relation to the proposed increase in the use of design review and its potential involvement in proposed developments, I believe this should no longer be a process carried on 'behind closed doors'. Instead, it should be undertaken on a much more open and transparent basis. Whilst planning officers and members of the applicants' team are allowed to attend and participate in dialogue with members of the Richmond Design Review Panel, others, with the exception of local councillors who may have a particular interest in the proposals are excluded from attendance. Such a situation appears to be in conflict with the role of the Review Panel in the public interest. It is noted that unlike the Council's former Conservation Areas Advisory Committee, the majority of the members serving on the Panel have no direct association with Richmond, nor have any declared special knowledge or understanding of its history, architecture, landscape and character, let alone, its conservation areas. Such a situation would suggest that the scope for the Panel to contribute usefully and effectively to the planning process in relation to proposed developments may be limited. For many years right up until the present, the real problem in relation to issues such as the design of new development, the design of alterations and extensions to existing buildings and the design of urban spaces, has been the tendency of the Council in its decision-making to approve proposals that are demonstrably

Respondent reference no.	Name / Organisation	Detailed comments
		inconsistent with its own adopted policies, guidance and planning-briefs, as so clearly reflected in the recent decisions to approve the proposals for the Stag Brewery Development at Mortlake – without consultation with the Council’s own Design Review Panel – and the proposals for the House of Fraser Development in Richmond.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to engage local communities in the plan making process earlier on. Often the Council has a planning performance agreement where officers give pre application advise – need to have some form of community engagement at this early state of the process. The council also needs to improve transparency and add to the public planning file and add the formal pre-application advise it gives. Some councils already do this, and it helps to provide confidence in the planning system.
28	Alice Shackleton on behalf of The Kew Society	Whether design review should be embedded must depend greatly on the structure, membership and openness of the Design Review Panel and its involvement. If members were required to have detailed local knowledge and if its participation in planning applications with the applicants was open to other interested parties as well as the applicants, it could be useful. Another tool perhaps could be the involvement of local amenity societies in the design review. These have the necessary detailed knowledge and connection to their areas.
31	Tim Catchpole on behalf of MESS	Yes, and it should have been done for the Brewery development.
41	Anthony Swan	Environmental ie amount heating etc required
42	Jeremy Gill	Will it fall down after thirty years. Will people be burned alive in it if there's a fire.
44	Roger Cutler	The ears to listen & take in local peopls' views. Most notably the views of people who live there who will be stuck with the end result.
45	Sally Beeson	New buildings should try and blend in with the local architectural style if there is any nearby
46 (a)	Joan Gibson	Not sure what a design review is - but currently LBRuT are agreeing to designs and layout which are not the optimum due to viewing that this is the responsibility of the developer and the developers offer has to be agreed.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	All developments must be holistically carbon neutral - else they could be subject to legal challenge re Paris COP objectives, as per Heathrow third runway.
51	Su Bonfanti	I like the idea of embedding the Richmond Design Review further. Although it seems unlikely that schemes in our area would be big enough to qualify, I hope there would be a trickle down from larger schemes, both in signalling to developers what is acceptable and in strengthening the hand of the Planning Committee.
52	Winston W Taylor	Consultation over large developments such as Twickenham riverside.
55	Jon Rowles	Need to have more 'verified' images as some of the CGG images are very misleading.
63	Carol Rawlings	The need for greater biodiversity and the greening of our towns through green walling, planted roofs and balconies.
<b>Should we develop our own borough-wide design guide to assist delivering high quality design, and what are the local areas' qualities and opportunities?</b>		
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	Anomalously, questions are posed about whether the Council should adopt its own Borough-wide design guide to assist in developing high quality design and what are the local areas' qualities and opportunities. The Group notes that the Council already has a very sound <i>Supplementary Planning Document – Design Quality</i> , adopted in February, 2006, and a very sound <i>Public Space Design Guide</i> , adopted in January, 2006, and can see no reason why either or both documents cannot be modestly updated insofar as is necessary. Similarly, the Group notes that the Council has published and adopted a series of no less than 13 <i>Village Plan Supplementary Planning Documents</i> , 56 <i>Conservation Area Studies (SPDs)</i> and 85 <i>Conservation Area Statements</i> , over past and more recent years – together with other documents such as the <i>Old Deer Park Supplementary Planning Document</i> of March, 2018. The Group notes that these documents already identify the local areas' qualities and opportunities, and can see no reason why they cannot be modestly updated insofar as is necessary.
24	Paul Velluet	Anomalously, questions are posed about whether the Council should adopt its own Borough-wide design guide to assist in developing high quality design and what are the local areas' qualities and opportunities. In this connection, I note that the Council already has a very sound <i>Supplementary Planning Document – Design Quality</i> , adopted in February, 2006, and a very sound <i>Public Space Design Guide</i> , adopted in January, 2006, and can see no reason why either or both documents cannot be modestly updated insofar as is necessary. Similarly, I note that the Council has published and adopted a series of no less than 13 <i>Village Plan Supplementary Planning Documents</i> , 56 <i>Conservation Area Studies (SPDs)</i> and 85 <i>Conservation Area Statements</i> , over past and more recent years – together with other documents such as the <i>Old Deer Park Supplementary Planning Document</i> of March, 2018. I note that these documents already identify the local areas' qualities and opportunities, and can see no reason why they cannot be modestly updated insofar as is necessary.

Respondent reference no.	Name / Organisation	Detailed comments
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Yes, but this will need to have another tier to reflect the distinctiveness of each town that makes up the borough. Whitton's main quality is that most of the roads and estates were planned and incorporate many green spaces and verges – giving the area a feel that is much lower density than it actually is.
28	Alice Shackleton on behalf of The Kew Society	A comprehensive design guide to incorporate existing SPDs on design quality, Conservation Area statements, Village Plans with the character areas, is possible within the adopted Local Plan scheme by amending as appropriate.
31	Tim Catchpole on behalf of MESS	The Village Plan studies in 2016 were surely the makings of Design Guides?
41	Anthony Swan	If it doesn't exist in this Country or as USA standards
42	Jeremy Gill	No and I haven't the faintest idea. You decide.
44	Roger Cutler	Only if it takes into account the views of the local resident which is rarely the case.
45	Sally Beeson	Yes most definitely!!!!
46 (a)	Joan Gibson	Use of pocket parks to give areas of good biodiversity (trees, hedges, flowers) with seating so people can walk a short distance to get outside and sit / chat. Park sheds and Pavilions and unused shops to be upgraded to run local workshops – music, art, knitting, baking etc. etc. Seating stops on the way to town centres to encourage active travel.  Infrastructure such as schools, NHS, dentist etc. to be local. Ensure parks have the right play areas. Teenager clubs in park pavilions to hang and play table tennis etc.  An awareness we need to make our designs greener and fuller of wildlife habitat so they will need to look different to the area. This needs to be added as an objective in the plan.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Yes
51	Su Bonfanti	I think the preparation of a design guide for the borough is essential, reflecting specific setting, character and history of different neighbourhoods. Any guide should recognise the importance of Richmond Road in East Twickenham as an approach to Richmond Bridge, one of the most important structures in the borough.
52	Winston W Taylor	Yes. As for qualities and opportunities, not enough time to consider
53	Richard Woolf on behalf of McDaniel Woolf Architects	Only if we see this as an issue of quality over style ... I'm uncomfortable with an historic architecture becoming the narrative, rather than an appropriate response to site, context and function.
55	Jon Rowles	Yes, but it should be done in a way where it can be updated outside of the local plan process.
56	Rob Kennedy, Environment Agency	Yes
58	Michael Atkins, Port of London Authority	Yes, it is considered this should include specific guidance for riverside developments in the borough.
59	Paul Massey	Yes as Richmond is a very special borough providing much needed open space for the residents of Richmond and beyond
61	Tom Minns	Yes
63	Carol Rawlings	Yes and it should be in keeping with the local areas including adequate space for biodiversity.
64	Johanna Eschbach on behalf of Richmond	Yes but within the borough there are different areas which might warrant these design guides to be adapted (e.g. leveraging shopfront traditions from Richmond Rd).

Respondent reference no.	Name / Organisation	Detailed comments
	Bridge Residents Association	
<b>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?</b>		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	There is an ageing population and a requirement to comply with the Equalities Act. This is important for reasons of access to buildings and the sustainability of many to undergo changes (lifts and level access for example) so that there is equal access for all as required by the Act.  Many of the Central Richmond buildings simply cannot be adapted to new uses and comply with current Building Regulations (the folly of not doing so - Grenfell). So although A1 to A3 use may be thought straightforward it is not and a blanket A3 use along George Street would not work safely.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	You could have a system where a percentage of units have to address the needs of different groups, such as a percentage of units suitable for elderly people, studio / home workers, for families – so that large sites have a broader mix of units than what often gets delivered. Some people do not drive – and new developments should also cater for them, rather than making them pay extra for parking spaces they will never use. Need to investigate if parking standards should be amended so that only X percentage of houses need to have car parking.
28	Alice Shackleton on behalf of The Kew Society	An important consideration must be to develop homes that accommodate different demographics within a community. If, for example, the residential element of town centres is devoted to small one and two bedroom flats appealing to younger working age people, it is difficult to see how a vibrant inclusive community would result. There must be a range of types of home, from the example of co-working mentioned earlier, small flats catering for working age people but also those for older people who may need support too, and larger flats and houses for families. There must be green space (not just on the roof!) for health of all groups. The importance of there being life in the community during the day as well as evening and weekends is vital. The need for affordable housing for young people (currently being met by densification) must not override considerations that make a vibrant community.
31	Tim Catchpole on behalf of MESS	It is important that homes are adaptable for lifelong living, e.g. for the elderly to live on the ground floor, etc.
41	Anthony Swan	Don't know. Probably!
42	Jeremy Gill	More homes for the increasing single population
44	Roger Cutler	Yes. Ask & listen.
45	Sally Beeson	I think there needs to be huge research into where our local ageing population would like to live. If there were good quality housing for them with maybe a warden on site, then they wouldn't feel the need to stay in their homes which are probably larger than their present needs. I am sure that many people would like to leave but see nothing to suit their lifestyle. Houses then would be possible for families with children.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
49	Margaret Edwards	I have already covered this in earlier responses. Extra care housing is a priority, intergenerational housing, reduced street clutter. Changes in Richmond Town were very good but Richmond station has not set down space at front and does not provide visual clues for access into station and from station to bus stops, taxis, shops, car park etc. Seating in Twickenham is good addition, Richmond and Teddington don't have as much.
52	Winston W Taylor	Not at this stage.
53	Richard Woolf on behalf of McDaniel Woolf Architects	This is a Building Regulations matter. I agree whole heartedly with the need for adaptive lifetime homes for all age groups.
55	Jon Rowles	- Need more starter homes (i.e. one double with a single bedroom) rather than the two double bedroom flat for the buy 2 let market. - More artisans flats - ie studio space attached - housing for older people should be near town centres where possible
56	Rob Kennedy, Environment Agency	No

Respondent reference no.	Name / Organisation	Detailed comments
63	Carol Rawlings	There should be a requirement for all flats to incorporate balconies where residents can grow plants and food. Homes for older residents or people with mobility problems should incorporate lifts and balconies with raised beds.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	A holistic approach is needed which also includes how design can help reduce environmental and noise pollution as these issues are likely to increase over time.
68 (b)	Mark Jopling	Yes - end the distinction in CIL payments between C2 and C3 which distorts the market.
<b>General comments relating to this topic area</b>		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	We have stressed the importance of the built environment to the future of Richmond and would be concerned with any potential relaxation of the high standards of design required under the policies in the present Local Plan. <a href="#">[section about compliance with Equalities Act and Building Regulations above]</a> We believe the policies in the current Local Plan covers design issues adequately and if further amplification is required we would suggest that it could dealt with by subsidiary planning tools.
<b>Reducing the need to travel and improving the choices for more sustainable travel</b>		
<b>Do you agree with the proposed policy directions?</b>		
Of respondents who answered the question: 18 said yes, 8 said no and 1 don't know [11 did not answer the question]		
1	David Mattes	<p>What I have to say may be controversial and not very PC but I believe it represents the views of a large number of residents and businesses in Richmond and therefore should be taken into account.</p> <p>Your draft plan laudably aims to encourage sustainability in travel/transport and to discourage use of private vehicles where possible. However:</p> <p>A great number of businesses in the borough rely on road transport for their supplies and to deliver to their customers.</p> <p>A great number of residents enjoy – and place a high value on – using their cars for social as well as business purposes.</p> <p>A smaller number of residents use their cars as an essential (ie: the only) link to family and friends, eg: the elderly and disabled people.</p> <p>With the increase in online ordering comes an increase in business vehicles delivering to homes and also to small businesses.</p> <p>The position of the borough, just south of the River Thames, means that many journeys by both business and personal vehicles are to and from places north of the river; and there are a limited number of road and rail bridges, several of which are often 'out of action' for long periods or have limited access because of ongoing work.</p> <p>Traffic jams in the borough are already at an unacceptable length, both of frequency and of length of delay.</p> <p>Therefore, the Council is faced with two diametrically opposite objectives: 1) To reduce traffic and make road use and other travel more sustainable; and 2) To improve traffic flow and to make homes, shops and other businesses more accessible by cars and delivery lorries.</p> <p>The current draft appears to address 1) but to ignore 2). Instead it should be aiming to solve this paradox or at least to achieve an acceptable balance between these two objectives.</p> <p><b>What is an 'acceptable balance'?</b></p> <p>The answer to this question will undoubtedly be controversial.</p> <p>My own view is that we should aim to eradicate – or greatly reduce – the worst effects of both options. Having done that, we should then aim to bring in measures that provide the greatest benefits of both options. Only after that should we consider tweaking any of the 'in between' measures. Do you agree?</p> <p>I wouldn't presume to say what are the best and worst of each of the two objectives; but I think it would be helpful if the Council were to set up panels or committees to do that, as a first step before recommending the best and most practical balance between them that would suit the business, social and residential demography of the borough.</p>
12	Tim Lester	<a href="#">Please see comments below.</a>
13	Heather Archer, Highways England	Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England

Respondent reference no.	Name / Organisation	Detailed comments
		<p>works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN.</p> <p>In the case of the area covered by the London Borough of Richmond, although there is no SRN within the borough boundaries, it should be noted that the M4 is located approximately 6km to the north of the borough and the M3 is located approximately 5km to the south west. Both the M3 and M4 are heavily congested throughout the peak hour periods and any material increase in traffic on this section of the SRN would be a concern to the Highways England.</p> <p>In spatial planning and development control terms, we have a duty to safeguard the operation of the SRN as set out in the DfT Circular 02/2013 (The Strategic Road Network and the Delivery of Sustainable Development). The circular encourages Highways England to work co-operatively with Local Planning Authorities within the framework of the Government's policies for planning, growth areas, regeneration, integrated transport and sustainability.</p> <p>We are a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. Highways England is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot be expected to cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour.</p> <p><b>Local Plan Direction of Travel Consultation</b></p> <p>It is noted that Highways England and the SRN have not been referenced within the Local Plan Direction of Travel Consultation document. Highways England should be consulted on any development that may have an impact on the M3 and the M4 which are the closet points of the SRN to the London Borough of Richmond. The document makes reference to a reduction in the availability of parking and a desire to embed car-free or car-lite developments within the borough, which would likely reduce the impact of such developments on the SRN. However, it should be ensured that we are consulted prior to submission of the updated plan for examination, to enable us to make an informed decision as to the soundness of the plan at the appropriate time.</p>
15	Transport for London	<a href="#">See comments above.</a>
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<p>Walking and cycling can be enjoyable and provide the benefit of exercise. We suggest walking and some cycling should be the principle mode of travel within Central Richmond, along the Riverside and around the Green. There already exists the riverside cycle route. It is important to take account of any adverse impact from cycling in the area largely set aside for walking. Through-traffic should be directed away from Central Richmond and the Green but we recognise that for the foreseeable future there will be a need for traffic along George Street and that pedestrianisation is not an option given the displacement around the Green and to other areas of Richmond.</p> <p>Cars emit carbon and air pollutants and the Direction of Travel seeks to reduce these as does the current Local Plan. During the life time of the current Local Plan zero emission cars could represent a significant proportion of the car fleet. But the DfT's current consultation on Transport De-carbonisation projects vehicle km to increase between 2020 and 2030 by around a 15% and associated carbon emissions to reduce by around 25%. These are UK wide statistics. Based on these figures, road congestion and carbon seem likely to remain issues through the life of the current Local Plan.</p> <p>We believe it important that planning takes on board electric charging of cars at scale.</p> <p>We support modal shift to public transport.</p> <p>Notwithstanding the direction of travel outlined, we do recognise that residents and visitors with zero emission vehicles should not be unduly inconvenienced with a reduction in visitor and resident car parking capacity.</p> <p>We believe the policies in the current Local Plan cover the travel issues adequately and if further amplification is required we would suggest that it could dealt with by subsidiary planning tools.</p>
29	Richmond Cycling Campaign	<p>P48 and onwards - Need to travel / sustainable travel</p> <p>We welcome the analysis and thrust of this section. In our view, there is now a much clearer understanding in the council than we have previously experienced of the importance of active and sustainable travel options.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>Given the related policy frameworks, from the mayor, but also from the Government, we believe that the council needs to be more aggressive in its pursuit of mode share changes, for both environmental and public health reasons.</p> <p>In this section we would like to see some more detail, and some more concrete objectives that will help to deliver sustainable travel - the elements so far do an excellent job of identifying all the different things which are needed to make these goals a reality, but we would suggest inclusion of elements like:</p> <ul style="list-style-type: none"> <li>• A plan to offer low traffic neighbourhoods across the borough</li> <li>• A commitment to offer cycle hangars on every road by 2026</li> <li>• Provide safe, pedestrian priority crossing points on every road in the borough (whether zebra, toucan, etc.)</li> <li>• Implementation of school streets for every school in the borough by 2025</li> <li>• Design and maintain publicly shared plans to provide everyone with a safe cycle lane within 400m of their home by 2030, and 200m by 2035</li> <li>• Create a working group with town centre businesses to set up last mile transport hubs, shared deliveries, and other identified schemes to reduce and coordinate deliveries</li> <li>• Work with 'car club' organisations and groups to see if there are opportunities for closer working, to speed the reduction in car ownership in the borough.</li> </ul>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>There needs to be two approaches to cycle lanes – we need through routes for people commuting long distances, e.g. into London. But we also need spokes of shorter cycle routes from town centres into their catchment areas to encourage more people to switch to bikes for short journeys into their local high street. Many existing cycle routes have missing signs, badly faded signs, no road markings, and can be in places almost invisible – such as the one that runs along Whitton High Street. The council need to audit the existing cycle routes and put in place a program to bring them up to an acceptable standard. Many cycle lanes are interrupted by crossing build outs which force cycles into the path of traffic – such as outside Twickenham School.</p>
31	Tim Catchpole on behalf of MESS	Yes, but more needs to be said about the role of the CPZ in making people pay for the use of the public realm including higher payments for additional cars.
39	Solomon Green	Large residential areas of the borough contain dwellings that are more than 800 meters from public transport and/retail. Elderly and disabled cannot ride bicycles or are unsafe on them. they rely on cars. Any proposal to reduce car ownership and usage would only lead to more elderly and disabled being trapped in their homes or, for those who could afford, making more use of uber and other hire cars as well as food deliveries. The latter already clog some many streets when delivering thereby adding to exhaust pollution..
42	Jeremy Gill	Disagree that you can plan this
44	Roger Cutler	The advent of green battery cars makes it unnecessary to reduce car usage.
46 (a) (b)	Joan Gibson	I like your focus on car-lite developments which have only delivery, disabled and car-club facilities only. Good public transport must also be available.
56	Trevor Rowntree	I disagree with CPZs. We should be able to park our cars close to amenities. Not having park spaces encourages people driving around to locate a parking space. This in turn causes more congestion and higher emissions.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	We should Promote walking, public transport and cycling., and stop use of cars and vehicles across the Borough.
50	John O'Brien	Deliberately making car travel unpleasant is not a good approach. There are still many traffic issues that could be solved by the plan which would improve driving experience and reduce wasted time in jams. You should give maximum advantage to 100% electric vehicles and include them in your list with walk, cycle, public transport
51	Su Bonfanti	I support the overall direction of reducing car usage and increasing public transport/cycle/walk. But I am not clear how you can affect through journeys, especially through-commuting by car, unless your policies are co-ordinated with neighbouring boroughs on this.
54	Paul Luton	Tending to be lacking in ambition.
61	Tom Minns	You seem to have become anti car almost as a religion. It's reached point where you are ignoring anyone with another viewpoint

Respondent reference no.	Name / Organisation	Detailed comments
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We support the overall direction of reducing car usage and increasing public transport/cycle/walk. But we are not clear how you can affect through journeys, especially through-commuting by car, unless your policies are co-ordinated with neighbouring boroughs on this. There is a particular issue in East Twickenham in the difficulty of cycling over Richmond Bridge. We would welcome a specific study of this issue, including the option of making the 9 pavement on one side a shared cycle/pedestrian path with separation curb, though this would also need consideration of what happens at the Richmond end. We don't support changing parking standards in low PTAL areas of the borough, ahead of actual improvements in access to public transport, as those areas likely to be less affluent ones already. We agree that some reduction in town centre parking might encourage more non-car trips. Alternative uses of some existing car parks might make sense, where they are in desirable locations, but at same time, could remaining car park areas be more intensively used? The Richmond Town Car Park is an extensive area but only on one level. A 2 storey car park in a pretty ugly location between the A316 and the railway line could provide what's needed and allow other locations to be freed for other uses. Generally, where parking is reduced, parking reserved for residents should be prioritised and parking for visitors removed first. And the council should consider the continued issuing of more than one parking permit per household. The CPZ in East Twickenham, Zone F, is already over-subscribed and this frustrates many possible changes.
69	Geoff Bond on behalf of Ham and Petersham Association	Until the PTAL rating is improved significantly for Ham and Petersham disincentives of car use will fall most heavily on those reliant on cars which tend to be older less mobile and those with young families
71	Patrick Wood	There should be more emphasis on reducing car-dependence.
<b>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?</b>		
21	Lucy Wakelin, Transport for London Commercial Development	TfL CD broadly supports Richmond's approach towards sustainable travel. We strongly agree that car-free developments should be supported and that development in locations with high existing or planned public transport accessibility should be optimised, in line with Intend to Publish London Plan Policy H1.
25	Phoebe Quayle	All new development should be 'car-free' with no parking for private cars. Most existing housing in Richmond has private car parking: there is no need for more of this type of housing. Many residents cannot or do not want to live with a car, particularly older and young people, and those on low incomes. New housing should cater for these people and, in doing so, also reduce car trips in the borough. The borough should also promote the redevelopment of sites like large surface car parks which encourage car trips, and reduce or remove parking for private cars, moving wherever possible to car club parking only, and ensure its Local Plan more generally links closely to the Borough's transport targets i.e. those relating to increasing use of public transport, walking and cycling, improving air quality and reducing car trips, traffic and road danger.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to get more bus routes built, and better cycle lanes – preferably segregated cycle lanes along main roads. Areas with lower levels of public transport also have higher levels of car use and this means there is more need to control fast and aggressive driving, therefore, more physical traffic calming measures need to be taken. Any new cycling facilities should also allow faster cyclists to be able to overtake slower cyclists – where possible - as this can cause conflict which puts people off cycling. As the volume of cyclists increase there is likely to be more conflict between different types of cyclists.
31	Tim Catchpole on behalf of MESS	Provide better public transport and more car club spaces.
35	Alice Roberts, CPRE London	<b>Planning for low-carbon, car-free development within the urban footprint is essential</b> <ul style="list-style-type: none"> <li>It is vital that all development is planned in such a way that people can live without private cars (since most housing in Richmond has car parking available, there is no need for new housing to cater for private car-parking: new developments can have car club parking only and sustainable transport hubs with cycle parking, delivery hubs etc.).</li> <li>Richmond needs to meet the Mayor's Transport Strategy targets, tackle air pollution, the climate emergency and road danger and improve people's activity levels and health. It will not be able to do this unless it plans for car-free housing development.</li> </ul> <p><a href="#">See also comments made above.</a></p>
39	Solomon Green	None the Council should consider improving and extending access to public transport as well as improving and road access.

Respondent reference no.	Name / Organisation	Detailed comments
40	Jamie Edwards	Not Answered
41	Anthony Swan	Bicycle lanes separate from that used by busses lorries and cars. Secure cycle parking near public transport.
42	Jeremy Gill	Build places closer together.
43	Paul Hart Prieto	This should not be based on increasing costs for car use as many have cars for longer distances. it should be based on providing a better service in public transport or cycle ways and cycle security etc. Intelligent public transport routing and increased frequencies "Uber style" shared service autonomous green vehicles etc. for shopping, many would need a car for larger purchases. if they cannot and start to use more online shopping then this negatively impacts our town centres and employment levels. maybe a scheme that allows someone to shop and then same day delivery routing?
44	Roger Cutler	More charging points for battery cars. As these are green you don't need car-free & car-lite policies.
45	Sally Beeson	Public transport needs to significantly improve with lower costs for everyone
46 (a) (b)	Joan Gibson	Need a full review of public transport. I regularly wait 25minutes+ for buses to Whitton when I see other frequent services go past me half empty. The Whitton bus then comes packed to the gills. If a driver is off sick (which it appears many are always on sick) then drivers need to be taken off more frequent services to ensure the less frequent ones are covered. Trains to Whitton although 4 an hour come grouped together so the net effect is, they arrive every half an hour. Bus timetables need to be linked to train timetables, so when you leave the train you can get a bus quickly. If there are road works buses, cycles and pedestrians need to be given their own route so the road works do not affect their timetables. Road works must be done in a more joined up manner. When the exit to the A316 at Hanworth was closed by TfI they routed the traffic through Whitton but refused to change the traffic light sequencing at the Whitton A316 junction to allow the traffic (which included buses) to disperse. Instead we had miles of traffic jams which again made public transport unreliable.  Cars must be stopped from crowding pavements. In Church Street Twickenham even, a single pedestrian cannot walk along the pavement as the pavements have been made narrow due to car parking spots (cars often then park on the kerb). Cars do not even need to access this road – they can use the road next to York House. Ban the car on roads such as this and town centres.
56	Trevor Rowntree	Lower emission cars should be encouraged rather than car-free/car-lite development.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Segregated cycle lanes. Improved walking routes. Prioritise pedestrians and cyclists over cars and vehicles. More, improved and cheaper public transport.
49	Margaret Edwards	Answered earlier re school journeys and commutes
52	Winston W Taylor	Restrict parking.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Investigate connectivity and new foot and cycle bridges. Review your WSP report from October 2018. <b>[A copy of the WSP Report was provided, which is available at <a href="https://www.richmond.gov.uk/media/16409/thames_bridge_feasibility_summary.pdf">https://www.richmond.gov.uk/media/16409/thames_bridge_feasibility_summary.pdf</a>]</b>
54	Paul Luton	Safe cycling routes to stations, shops, schools etc. In fact a safe borough cycle network. Cycling levels are high despite poor provision. With good provision we could reach Dutch levels. Lower levels of access to public transport is highly relative ; compared with most of the country the whole borough is well provided.
59	Paul Massey	clean public transport is the the key to a brighter future in the borough
60	Kingsley Izundu, Royal Borough of Kingston upon Thames	1. Improved public transport accessibility 2. Good design that will reduce conflict between pedestrians and motor vehicles. 3. Good accessibility to social and cultural facilities within the area. 4. Location of facilities in an accessible location to pedestrians and cycle use.
61	Tom Minns	Change the policy

Respondent reference no.	Name / Organisation	Detailed comments
63	Carol Rawlings	Bus lanes wherever feasible. Reintroduction of trolley buses (quieter and smoother than buses and less polluting). A tram to run along the current 65 bus route.
68 (a)	Mark Jopling	EV charging infrastructure, shared-ownership vehicle infrastructure 100% EV buses by 2030 Although outside the Borough, there should be a new "multi-modal" transport hub just SW of Jn1 M3 to take "through traffic" off the M3 and onto SW Trains Shepperton Line (and in future Crossrail 2)
68 (b)	Mark Jopling	More EV charging More dedicated cycling routes Multi-mode hub on the M3 to offload car traffic onto SWT
69	Geoff Bond on behalf of Ham and Petersham Association	Improve the public transport and avoid a reduction in space for cars by opposing closing Richmond Park to through traffic. Make owning an electric car possible by providing some public charging points.
70	Melissa Compton-Edwards	Improve public and active transport provision in low PTAL areas (including bus frequency) so that car-free and car-lite developments are possible. Take active transport provision into account when considering applications. Do not give approval to any new residential or business developments that are not car-free/car-lite.
71	Patrick Wood	Better public transport provision, if necessary through prioritising buses over private vehicles, including where they can be parked.
<b>What additional facilities does the borough need to support greater levels of walking and cycling?</b>		
12	Tim Lester	I read through a lot of the plan, most of which I agree with, and then ran out of time. There is one area on which I would like to comment which relates to cycling in the Borough. <b>1. Encouraging more young people to cycle</b> <i>I live at [full Hampton address details removed for data protection].</i> Every morning a string of buses passes up the road to Hampton School and LEH carrying their pupils. A number of pupils, mainly boys it seems, walk past probably from the R70 bus stop or Hampton Station. The thing which I find surprising and disappointing is how few pupils cycle past. If we are to change to a more sustainable transport system we need more people cycling. If they don't cycle when they are young it is likely to be very difficult to get them on a bike in later years. I see some cycling proficiency classes in progress locally which is great but is it possible to encourage a larger proportion of youngsters to learn to cycle safely? Another problem is probably parents fears over safety and the 20 MPH limit may help in this respect. Cycling UK might have ideas and suggestions or indeed be able to organise help. <b>2. Cycle Paths</b> I feel that those responsible for transport in the Borough should be sent out on bikes to use and experience the cycle paths for a few weeks. There is a tendency for paths to stop when things get tight, for the surface to be terrible (eg alongside the A316), to find vehicles parked across the cycle path (e.g. the Upper Sunbury Road, as it leaves Hampton invariably has one or more coaches parked on the path), etc. Some first hand experience by those who normally drive around could be very educational.
14	Transport for London	<a href="#">See comments in General Section.</a> Securing sufficient quantities of good-quality cycle parking will also enable more people to cycle. We welcome the commitment to the London Plan cycle parking standards and commend the Council for looking beyond this to investigate the potential for higher standards. We strongly support this approach in Richmond, given the proportion of existing journeys that could be cycled and considering that the borough has one of the highest cycle mode shares in London.  We welcome the Council's approach to securing developer contributions to the cycle networks within Richmond and note that the Council's Active Travel Strategy highlights areas that are less permeable by cycle. This is something that developer contributions could also potentially look to improve alongside strategic and local routes. We welcome the recognition of the importance of bus networks within the borough and will continue to work with the Council to understand how services and infrastructure can be improved, protected and funded.

Respondent reference no.	Name / Organisation	Detailed comments
20	Gary Backler, Friends of the River Crane Environment.	<p>FORCE supports improvements in transport provision for both cyclists and pedestrians. Our surveys offer quantitative evidence of the order of magnitude increases in cyclist and pedestrian usage that can follow investment in new and improved provision. We support the improvements that have been made in this regard in the borough during recent years. We believe there is scope for further improvements along the River Crane and DNR that will benefit road traffic management, connectivity and public health, and address positively the “constraint...of open space, linked by roads and interwoven by railways” (p8) that characterise the borough.</p> <p>FORCE would welcome a borough-wide review of the obstacles to “inclusive access and connectivity” (p51) for pedestrians and cyclists. We would particularly welcome a review of the severance factors which prevent the physical joining up of current, near-adjacent open spaces into larger spaces; and of the obstacles to improved pedestrian and cycle connectivity between such open spaces, including land ownership; and a prioritised plan to address such factors.</p> <p>We know that many people use pedestrian and cycle networks across borough boundaries and this is what enhances their value for local residents and the wider communities. This approach can also bring in funding sources that are not available to in-borough schemes. As yet though, despite asserting that “We also work closely together with neighbouring boroughs...particularly where issues cross borough boundaries” (p6), the Local Plan in general does not consider what happens beyond the borough boundary. We believe that the council needs to consider active travel at a sub-regional level, working alongside other boroughs and in concert with agencies such as Crane Valley Partnership and Thames Landscape Strategy, to help deliver these cross borough links.</p> <p>In 2019 FORCE worked alongside Ove Arup, The Crane Valley Partnership and The Colne Valley Partnership to produce the “Colne and Crane Valley Green Infrastructure Strategy”. This document sets out a strategy for enhancing the linkages along the Crane valley and Colne valley corridors, linking the Thames with the Chilterns through a network of biodiverse green transport networks <a href="http://www.cranevalley.org.uk/news/post/Colne-and-Crane-Valleys-Green-Infrastructure-Strategy-published.html">http://www.cranevalley.org.uk/news/post/Colne-and-Crane-Valleys-Green-Infrastructure-Strategy-published.html</a> LB Richmond officers engaged with this project as a key consultee. FORCE considers that the Local Plan would benefit significantly from adopting the strategy as a strategic objective for enhancing green links between the borough and wider green infrastructure network.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p><b><u>Borough:</u></b></p> <p>Of the utmost importance there is secure cycle parking – as bike theft is the number one reason why people choose not to cycle. We need this in town centres, and in all new housing units.</p> <p>Need a compressive system of cycle lanes marked onto the main roads.</p> <p>Need to review all existing cycle lanes and ensure the road markings and more prominent – the current light touch approach means that most cycle lanes are unusable. Twickenham town centre is an example where the markings are not up to the job.</p> <p>Where cycle lanes have to stop – such as on a narrow bridge or through a busy high street – the council need adopt a mixed-use zone approach – so that its very clear to motorists that they are sharing he space equally with cyclists. For this to work we need a change is tarmac colour or surface, prominent road markings and signs, and traffic calming.</p> <p>Need to identify main walking routes and maintain them better – to match the standards on the main roads – currently most main routes are based on car usage.</p> <p>To survey all the crossing points as many don’t meet the requirements of the Equalities Act – i.e. no dropped curbs or dropped curbs not flush with road.</p> <p>Maintain vegetation on bridges better – many footpaths over bridges have hedges that encroach on the footpath and narrow it down too much. When this occurs, it can take months before its cut back.</p> <p>Need more secure cycle parking near stations.</p> <p>Need more speed calming on main roads as the 20 MPH is not adhered too – and fast traffic dissuades people from cycling and walking.</p> <p>Need benches at periodic intervals so people can sit down and rest on walking routes. We used to have a network of these, but some of these were removed because they were perceived to led to antisocial behaviour.</p> <p><b><u>Heathfield &amp; Whitton</u></b></p> <p>Need a road cross by the underpass on the A316 by Jubilee Avenue / Meadway. There is a large part of what was historically Whitton (and still part of St Augustin’s Whitton Parish) across the A316 including Lincoln Avenue and Kneller Gardens.</p> <p>We believe the speed limit on the A316 between Hospital Bridge Road and Whitton Road should be reduced to 30 MPH and the lanes narrowed / regraded so that the A316 does not slice the area into two. The reclaimed space could be used to prove good quality cycle lanes.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>There is a need for a network for cycle lanes that fan out from Whitton High Street so that local residents are encouraged to make short trips by bike rather than car. The cycle lane in Hanworth Road has large gaps and the zebra crossings haven't been updated to reflect the changes in legislation that allows a cycle lane to continue through them.</p> <p>Percy Road has a part time cycle lane that operates from 8am to 9.30am on one side of the road only. We recommend that the council explores converting this to 24 hour operation, and one is added to the other side of the road too.</p> <p>On Hospital Bridge Road, the TFL cycle lane around the roundabout ends at the TFL land boundary outside the church and the cyclists are expected to squeeze back onto the main road where there is hardly any room for them. We suggest that the pavements around the Hospital Bridge Road Traffic Lights also become mixed use. The railway bridges on Hanworth Road, Hospital Bridge Road and Nelson Road need upgrading to provide footpaths at least 2 meters wide (as they only have footpaths on one side).</p> <p>Some of the traffic islands on Percy Road need to be altered to convert them into pedestrian refuges. None of the five islands between Rycroft Avenue and Montrose Avenue had pedestrian facilities.</p>
31	Tim Catchpole on behalf of MESS	Reduce parking spaces in our town centres but keeping provision for the elderly and disabled.
39	Solomon Green	Improve pavements and prosecute all cyclists (and scooter users) riding on them.
41	Anthony Swan	protected cycle lanes
42	Jeremy Gill	Fill some of the holes in the roads. They cause cyclists to fall off a lot and buckle wheels. Repair some of the pavements. You know pavements, what we walk on.
43	Paul Hart Prieto	Secure bike storage more and simpler "rent a bike" schemes new and direct, walkways between towns
44	Roger Cutler	For walkers we need cycle-free pavements. Although against the law, pavement cycling is injuring more walkers daily. It is ignored by police and council workers (indeed pavement cycling is even promoted by one council worker.) We don't want any more cycling in the borough. Cyclists are insensitive, travel too fast for safety &, worst of all, are not licensed so they can be prosecuted. Cycling receives too much money & attention.
45	Sally Beeson	I think in general, the Borough does a very good job to raise awareness. Schools and parents should encourage children to walk more
46 (a) (b)	Joan Gibson	<p>We need to get away from thinking cars and powered vehicles can be zero emissions. They always will emit particulates and until we have a 100% renewable generated electricity will create emissions somewhere in the UK. I make this point as this needs to be reflected in policies as there is a tendency to think we do not have to change our behaviour technology will save us – this is not the case. I would be happier with lower emission vehicles being used as a term in your document. Huge concerns about the cycling plans. You have taken only what is happening now to focus improvements and spend on areas where cycling is high. Richmond must have a vision and plan to improve those areas where cycling trips are low. These low cycle areas have the biggest potential to get more folks cycling, reduce car use and improve health.</p> <p>Planning does have a massive role in enabling Active travel, but all the rules and policies exist already and planning are accepting less from developers. Could LBRuT explain how this will change in the future.</p>
47	Trevor Rowntree	None. Enough/too much has been done already.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	<p>Segregated cycle lanes.</p> <p>Improved walking routes.</p> <p>Prioritise pedestrians and cyclists over cars and vehicles.</p> <p>More, improved and cheaper public transport.</p>
49	Margaret Edwards	Better walking access to riverside all the way along, some owned privately. Footbridge between Ham and Twickenham a good idea
50	John O'Brien	Segregated cycle lanes that are continuous and which cannot be parked in.
51	Su Bonfanti	There is a particular issue in East Twickenham in the difficulty of cycling over Richmond Bridge. I think you need a specific study of this issue, including the option of making the pavement on one side a shared cycle/pedestrian path with separation curb, though this would also need consideration of what happens at the Richmond end.

Respondent reference no.	Name / Organisation	Detailed comments
52	Winston W Taylor	Stop clutter on pavements such as advertising boards; widen some pavements; stop cycling on pavements; increase cycle parking in some areas where demand arises.
53	Richard Woolf on behalf of McDaniel Woolf Architects	See response to Q.73
54	Paul Luton	A circulation plan with through traffic limited to certain roads would provide a better environment for walking and cycling. Safe crossings of the main roads would be needed. Cycling generally provides longer distance travel so segregated provision on main roads would also be needed.
58	Michael Atkins, Port of London Authority	Considered that there must be reference within the Local Plan that for developments in close proximity to the River Thames, there must either maintain and improve existing access to riverside areas or provide new access to the riverside and the Thames Path., in line with existing Local Plan policy LP 18 (River Corridors)
59	Paul Massey	Dedicated cycling safe route from Ham to Richmond 24 /7
60	Kingsley Izundu, Royal Borough of Kingston upon Thames	1. Adequate and affordable cycle parking bays. 2. Subsidised cycle renting. 3. Well segregated pedestrian walkways and cycle routes. 4. Better frequency of bus services.
61	Tom Minns	None
63	Carol Rawlings	Walkers and cyclists need to be separated from one another, particularly along the tow path which has become dangerous for walkers and seriously overcrowded at weekends. If vehicles continue to use Richmond Park, cyclists should be banned from using the roads and the cycle paths, which are never used, need to be upgraded.
68 (a)	Mark Jopling	Better protected cycle routes through the Borough
69	Geoff Bond on behalf of Ham and Petersham Association	Make sure all facilities that are needed are local eg all healthcare, all schools and all shops. Until they are people will continue to use vehicles. Hold developments to their green transport policy and prevent future developments until they do - the German School gets ever bigger without actually keeping to its green travel plan.
70	Melissa Compton-Edwards	Given the related policy frameworks, from the mayor, but also from the Government, the council needs to be more aggressive in its pursuit of mode share changes, for both environmental and public health reasons.  In this section I support the Richmond Cycling Campaign's desire to see some more detail, and some more concrete objectives that will help to deliver sustainable travel - and would suggest inclusion of elements like: A plan to offer low traffic neighbourhoods across the borough A commitment to offer cycle hangars on every road by 2026 Provide safe, pedestrian priority crossing points on every road in the borough (whether zebra, toucan, etc.) Implementation of school streets for every school in the borough by 2025 Design and maintain publicly shared plans to provide everyone with a safe cycle lane within 400m of their home by 2030, and 200m by 2035 Create a working group with town centre businesses to set up last mile transport hubs, shared deliveries, and other identified schemes to reduce and coordinate deliveries.
71	Patrick Wood	Better cycling infrastructure: better road surfaces, segregated infrastructure, ASLs, enforcement of existing traffic laws to make the roads less intimidating for cyclists of all abilities.
<b>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?</b>		
Of respondents who answered the question: 9 said yes, 14 said no and 3 don't know [12 did not answer the question]		
14	Mayor of London	The Mayor is pleased that Richmond intends to apply the Intend to Publish London Plan residential parking standards, including those for areas with low public transport accessibility levels (PTALs). Richmond should also explore the potential for increasing levels of public transport, cycling infrastructure and promoting other

Respondent reference no.	Name / Organisation	Detailed comments
		forms of active travel such as walking in accordance with the Mayor's Healthy Streets Approach. Whilst the Mayor strongly supports Richmond's objectives on sustainable travel, it should be aware of the Secretary of State's Directions on the Intend to Publish car parking standards.
15	Transport for London	See comments in General Section. A key part in achieving this ambition [ <a href="#">addressing the climate emergency and housing crisis and its recognition of the importance of transport in achieving this, as well as tackling other health and environmental challenges through prioritisation of sustainable transport users</a> ] will be restricting the provision of car parking in new developments. We would therefore strongly encourage the Council to require car-free and car-lite development as far as possible. We strongly welcome that the Council are considering adopting the London Plan residential standards across the whole borough and encourage this option to be pursued. This will help minimise new development's contributions to the climate emergency, make it easier to tackle the housing crisis and reduce congestion on the road network and the borough grows.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	Ideally, cars used by visitors to Richmond should be parked at the perimeter of Richmond and bikes used to access the Richmond rail station should be parked at the station. People transferring from cars to train/tube should use Richmond's car parks. Cars used by residents should be allowed within Central Richmond and around the Green. Clearly these suggestions raise issues of displacement, parking and implementation.
22	Jimmy Wallace, Richmond Athletic Association	We note the suggested policy directions to encourage sustainable transport and welcome the opportunity to review the detailed policies as these are further drafted. At this stage, we would simply note that appropriate levels of car parking for development should appropriately be assessed as part of any future planning application dependent upon the uses within the scheme.  It is also recognised that it is necessary for there to be overarching policy and guidance in the context of planning applications that are referable to the Greater London Authority (and by extension Transport for London) for its determination. However, we think it is necessary for there to be clarity in the policies at the local level that acknowledge that local site circumstances and transport considerations should be the key determinant in setting appropriate levels of car parking, as opposed to the London wide parking standards adopted by the GLA & TfL which by their very nature cannot consider the individual transport and accessibility circumstances of all sites.
29	Richmond Cycling Campaign	A possible study, which could inform a number of other policy areas, could be analysis of how much space in the borough is given to car parking, whether residential or business - it would surely be worthwhile to understand how much public land is devoted to the parking of vehicles right now, as we could then have another data set to show us the benefits gained from releasing this land to other uses.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Though its unpopular to reduce parking, evidence shows that mode shift can be achieved. However, there is the risk that it could have a negative environmental impact if it results in people driving round the block several times before a space becomes free. It may be more appropriate for the council to look at changing the charging structure, and prioritise short term stays rather than allowing all day parking. In Richmond Town Centre many parking spaces are taken up by commuters using it as an all-day park and ride to central London – and the consequence lack of parking is prompting local people to drive to Kingston instead when they need to access higher level services and this results in money leaving the boroughs local economy.
39	Solomon Green	We live too far from the (currently infrequent) public services to make regular use and would merely transfer our expenditure to other areas outside our borough.
41	Anthony Swan	It would discourage me from visiting. Short term free parking ie 30mins already in existence is very good.
42	Jeremy Gill	Which of the above do you mean? Cycle
43	Paul Hart Prieto	I already use public transport and walk mainly. less parking would simply stop me making larger purchases in the town centre
44	Roger Cutler	Neither I, nor any friends, would continue to use the town centres. Public transport is too unreliable
45	Sally Beeson	It would annoy me - we cannot demonise all car related activities
46 (a)	Joan Gibson	Pedestrianising the town centre would encourage me to use them more
46 (b)	Joan Gibson	To encourage me to go back to cycling to Whitton and Twickenham town centres you must fix the issues you have caused by narrowing the roads and give cyclists a priority above cars. Stop cars parking in cycle lanes, create cycle routes such as an off-road cycle lane at Whitton corner so cyclists do not have to try and negotiate a junction which is recognised as being dangerous.
49	Margaret Edwards	Already walk or use bus/train to get into town centres
50	John O'Brien	Already use public transport except when my trip requires me to take the car.

Respondent reference no.	Name / Organisation	Detailed comments
51	Su Bonfanti	I live so close that we don't drive into Richmond anyway.
52	Winston W Taylor	I dont drive so this question is not for me.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Parking and cycling are separate issue. Economics and the quantum shift required to move to sustainable transport isn't about parking.
54	Paul Luton	That is how I travel now.
60	Kingsley Izundu, Royal Borough of Kingston upon Thames	1. Yes, if the alternative is good enough. 2. Improve frequency of bus service. 3. Adequately segregated pedestrian walkway. 4. Affordable cycle rental service.
63	Carol Rawlings	I avoid using my car to go to any town centre.
69	Geoff Bond on behalf of Ham and Petersham Association	It would discourage me from shopping there
70	Melissa Compton-Edwards	I already walk, cycle or use public transport to get to the borough's town centres and support reducing parking availability in town centres to encourage mode shift to sustainable forms of transport.
<b>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?</b>		
Of respondents who answered the question: 16 said yes, 11 said no and 2 don't know [9 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	It would be a mistake to remove car parks in town centres as it would push the parking onto the roads and make it more difficult to reallocate space on these roads to cycle lanes. However, cities like Paris have made better use of their open-air carparks by redeveloping the sites and putting the parking underground and putting much needed housing and offices above.
35	Alice Roberts, CPRE London	<b>[Response also in Retail section].</b> <b>Surface and multi-storey car parks, along with low-rise retail sites, should be redeveloped to make more efficient use of space and discourage car trips.</b> <ul style="list-style-type: none"> <li>• Surface car parks are an inefficient use of space and encourage non-essential car journeys. In Annex 1 a number of sites are identified which could be redeveloped to find space for housing and commerce and at the same time reduce reliance on cars.</li> <li>• These sites are viable and much more sustainable alternatives to Green Belt.</li> </ul> <b>[See Annex 1 in the Schedule of Call for Sites Responses]</b>
39	Solomon Green	But it could build over rather than on top of some car parks such as that in Richmond on the A 316.
41	Anthony Swan	Be a bit more brutal with large developers over affordable housing.
43	Paul Hart Prieto	Parking will still be required. that said, parking with Flats above could provide a reasonable solution
44	Roger Cutler	We need MORE parking, not less.
45	Sally Beeson	I think this should be monitored to see if all car parking spaces are used enough, and then maybe change the policy
46 (a)	Joan Gibson	With the car parking underground
46 (b)	Joan Gibson	I agree the council should build on its town centre car parks. The parking could be place under the building with very little net loss.
49	Margaret Edwards	Richmond car park opposite Old Deer park seems a prime location
51	Su Bonfanti	I think that some reduction in town centre parking might encourage more non-car trips. Alternative uses of some existing car parks might make sense, where they are in desirable locations, but at same time, could remaining car park areas be more intensively used? The Richmond Town Car Park is an extensive area but only on one level. A 2 storey car park in a pretty ugly location between the A316 and the railway line could provide what's needed and allow other locations to be freed for other uses. Generally, where parking is reduced, parking reserved for residents should be prioritised and parking for visitors removed first. And the council should consider the continued issuing of more than one parking permit per household. The CPZ in East Twickenham, Zone F, is already over-subscribed and this frustrates many possible changes.

Respondent reference no.	Name / Organisation	Detailed comments
52	Winston W Taylor	Elleray Hall proposal is a good example
53	Richard Woolf on behalf of McDaniel Woolf Architects	Look at the ' air above ' the land.
60	Kingsley Izundu, Royal Borough of Kingston upon Thames	The evidence should dictate the approach to provision of uses. There should be a good balance in the pursuit and provision of alternative uses. The provision of use should lead to sustainable development.
63	Carol Rawlings	Housing that is truly affordable is more important than driving a car.
69	Geoff Bond on behalf of Ham and Petersham Association	This would just mean the shops close and people drive to where they are open
71	Patrick Wood	Car parking is massively subsidised: the real cost is shocking, both monetary and environmental.
<b>General comments relating to this topic area</b>		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<p>We have referred to the importance of reducing carbon and other air pollutants under the theme on these two topics. <i>[See comments as above]</i></p> <p>Walking and cycling can be enjoyable and provide the benefit of exercise. We suggest walking and some cycling should be the principle mode of travel within Central Richmond, along the Riverside and around the Green. There already exists the riverside cycle route. It is important to take account of any adverse impact from cycling in the area largely set aside for walking. Through-traffic should be directed away from Central Richmond and the Green but we recognise that for the foreseeable future there will be a need for traffic along George Street and that pedestrianisation is not an option given the displacement around the Green and to other areas of Richmond.</p> <p>Ideally, cars used by visitors to Richmond should be parked at the perimeter of Richmond and bikes used to access the Richmond rail station should be parked at the station. People transferring from cars to train/tube should use Richmond's car parks. Cars used by residents should be allowed within Central Richmond and around the Green. Clearly these suggestions raise issues of displacement, parking and implementation.</p> <p>Cars emit carbon and air pollutants and the Direction of Travel seeks to reduce these as does the current Local Plan. During the life time of the current Local Plan zero emission cars could represent a significant proportion of the car fleet. But the DfT's current consultation on Transport De-carbonisation projects vehicle km to increase between 2020 and 2030 by around a 15% and associated carbon emissions to reduce by around 25%. These are UK wide statistics. Based on these figures, road congestion and carbon seem likely to remain issues through the life of the current Local Plan.</p> <p>We believe it important that planning takes on board electric charging of cars at scale.</p> <p>We support modal shift to public transport.</p> <p>Notwithstanding the direction of travel outlined, we do recognise that residents and visitors with zero emission vehicles should not be unduly inconvenienced with a reduction in visitor and resident car parking capacity.</p> <p>We believe the policies in the current Local Plan cover the travel issues adequately and if further amplification is required we would suggest that it could dealt with by subsidiary planning tools.</p>
46 (b)	Joan Gibson	Worried you are saying street building should be for walking (only) – this focus on walking only has meant LBRuT have spent a huge amount of money making changes to roads and pavements which has made it worse for cyclists. Whitton and Twickenham town centres could have been designed to include cyclists when you spent multi-millions of pounds on pavements and road layout. Instead you narrowed the roads and forced cyclists into the flow of traffic. In Whitton it has resulted in

Respondent reference no.	Name / Organisation	Detailed comments
		<p>less people cycling. This sort of costly mistake must not be repeated. All new street and road design must include separated pedestrian, cycling and road infrastructure – with road being the least important.</p> <p>Cars must be stopped from parking in cycle lanes.</p> <p>Your connectivity plans do not include improvement to certain areas in Hampton with no bus routes and Whitton with low frequency. Cycle routes must be made in Whitton.</p> <p>You can improve walking routes by opening up routes through cemeteries (pleasant, direct and low pollution) and other infrastructure sites. Walking routes need to be mapped out and focus put on them. i.e. all the budget in Whitton seems to be focussed on the car routes to the High Street rather than the walking routes along Springfield Road etc. These walking routes are in a poor state of repair.</p> <p>New developments must include secure cycle storage – not just outdoor posts. Cycle crime is a key obstacle to cycling.</p> <p>New developments must provide good walking and cycling routes to local areas like town centres, parks, medical centres.</p> <p>I disagree you are trying to ensure congestion and airquality is a consideration in new developments currently. In the case of both THS and Lidl on South Road planning recommended approval without any mitigating actions despite knowing about the huge levels of congestion. Once again, I think you are over estimating what quality criteria LBRuT impose on developments, making the likelihood of this change to the local plan actually working very remote.</p> <p>I worry that in areas of low PTAL you focus on parking standards rather than improving the PTAL. If you are serious about getting more people on public transport you need to improve the PTAL. I completely disagree with you adopting the London plan parking levels (high or low). You must improve the PTAL to make car ownership and use less needed.</p> <p>I worry about remarks like “if PTAL can be improved or if walking routes can be improved”. There is no option your plan should say – high PTAL, walking and cycling routes will be provided – otherwise no development.</p> <p>Walking routes need seating along them.</p> <p>All developments (not just large) should have a levy which contributes to walking and cycling infrastructure so you do not let lots of “small” developments through with the net effect of raising car use and reducing active travel.</p>

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

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

Of respondents who answered the question: 20 said yes, 2 said no and 3 don't know  
 [13 did not answer the question]

10	Stuart Morgans, Sport England	<a href="#">Please see comments in Section relating to Social Infrastructure.</a>
22	Jimmy Wallace, Richmond Athletic Association	<a href="#">Please comments below.</a>
42	Jeremy Gill	Incomprehensible
46 (a)	Joan Gibson	See below

Respondent reference no.	Name / Organisation	Detailed comments
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
55	Jon Rowles	The council needs to have a 'Sequential Test ' process written down so we don't have the re-run of the Turing House School situation where council officers wrote the test as they went along.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We support the idea of 'increased public access to school facilities'. We're about to have a whole new school - the biggest bit of infrastructure in East Twickenham for years - and it would be good for it to be well used. We also recognise the importance of sustaining ETNA, as well as the existing tennis, cricket and bowls facilities.
<b>Is there a need for a particular type of community facility in your local area?</b>		
4	Lambert Smith Hampton on behalf of Metropolitan Police Service	<p>Lambert Smith Hampton (LSH) has been instructed by the Metropolitan Police Service (MPS) to make representations to the above consultation. This representation concerns the MPS' infrastructure requirement for a car pound facility within the London Borough of Richmond, S106 contributions to mitigate impact on crime, and the MPS infrastructure requirement for neighbourhood police facilities.</p> <p><b>Requirement for a car pound</b></p> <p>The MPS infrastructure requirement has changed since we submitted our representation to the Council in January 2020 for the Richmond Planning Obligations SPD Consultation. The MPS now have an urgent infrastructure requirement for a car pound facility within the London Borough of Richmond or any other London Borough. The requirement is for 6 - 12 acres (2.5 - 5 hectares) of open industrial land (leased from private landlords or purchased freehold).</p> <p>A car pound facility is where the MPS deal with vehicles that have been stolen, seized for motoring offences or for forensic examination. The MPS are finding that the owners of their existing car pound sites are seeking to pursue development opportunities and cease the current use when the lease permits. Both of the current car pound sites are subject to pressure for industrial and/or residential development and intensification of use.</p> <p>The MPS are concerned that if their existing car pounds have to be vacated, this may have significant difficulties in operating their vehicle recovery and car pound service. The difficulties that exist in finding land for car pounds also extend to other aspects of policing, including the following:</p> <ul style="list-style-type: none"> <li>- Driver training;</li> <li>- Firearms training; and</li> <li>- Dog Training.</li> </ul> <p>The MPS are therefore requesting that the London Borough of Richmond work with the police to identify suitable plots for the delivery of a car pound facility within the borough. (Richmond is considered to be a good location for the delivery of a MPS car pound facility).</p> <p>Further to the above, the MPS request that the emerging Richmond Local Plan and/or Infrastructure Delivery Plan (IDP) include a section highlighting the importance of the MPS car pound requirement in the borough.</p> <p><b>Neighbourhood police facility infrastructure requirement</b></p> <p>As noted in our representation to Richmond Council in January 2020, the MPS have an infrastructure requirement for neighbourhood police facilities that can provide a base of operation for officers of the MPS.</p> <p><b>Summary</b></p> <p>The MPS have an urgent infrastructure requirement for a car pound facility and are requesting that the Council work with the police to identify suitable plots. The MPS would like this infrastructure requirement to be referenced in the new Local Plan and/or IDP. The MPS are pleased to see that policing is referenced as social infrastructure in the adopted Local Plan and have an infrastructure requirement for neighbourhood police facilities.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		We are keen to engage with you to discuss how the MPS car pound infrastructure requirement can be accounted for in the borough and the potential for a site allocation in the future.
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	In responding to Question 78, the Group supports the proposed continuation of the policy for the protection and, where possible, the enhancement of existing land and facilities for sport and playing fields, and the protection of Public Open Space and the provision of enough play-space. In relation to the Old Deer Park in particular, the Group supports the continued use of both public and private open space for outdoor sports, including rugby football, association football, cricket, tennis, archery and bowls, and the retention and potential enhancement of the existing, listed Pools-on-the-Park – including, importantly, its associated landscaped open-space – for swimming and directly related leisure activity. In addition, the Group supports the commissioning of up-to-date research on Indoor Sports Facilities Needs Assessment, Playing Pitch Assessment, Playing Pitch Strategy and an Open Space Assessment, as put forward on page 54 of the consultation document.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The pavilion in Heathfield Recreation Ground needs rebuilding, to provide better sports facilities and a room for community use in the South part of Whitton. The original pavilion built in the first half of the twentieth century had these facilities.
31	Tim Catchpole on behalf of MESS	Yes, Mortlake needs a health centre. There are ongoing discussions about community infrastructure on the Brewery site.
32	Mark Jopling on behalf of UPPFT	The Trust makes the following comments on the "Direction of Travel": <ul style="list-style-type: none"> <li>Keep the Playing Pitch Strategy up-to-date as a strong document, with regular local club and NGB consultation. Speculators seek to exploit documents like PPS if they are not current and robust, community clubs will be vulnerable to "vultures" after loss of income due to CV-19.</li> </ul>
36	Rebecca Marwood, NHS Property Services Ltd	<p>Foreword</p> <p>NHS Property Services (NHSPS) is actively working with our customers regarding the recent cases of coronavirus (COVID-19) and are currently assessing vacant or underused space across our portfolio to identify space that could be repurposed for the provision of clinical beds.</p> <p>In the interests of continuing to support the NHS in the longer term, however, we are keen to continue 'business as usual' activity where possible, and are supporting our customers in the management of their buildings and wider portfolios, to ensure the most efficient and effective use of NHS space.</p> <p>NHS Property Services</p> <p>NHSPS is a limited company owned by the DHSC. It was established in 2013 to bring property expertise to the NHS estate, with the aims of creating a more fit for purpose estate, reducing property related costs and generating funds to be reinvested in healthcare services and facilities.</p> <p>NHSPS had a portfolio of around 3,500 buildings across England which represents around ten percent of the entire NHS estate. Most of these buildings are used for primary healthcare and are either health centres or hospitals. However, NHSPS' properties are diverse in terms of their function and include many other types of premises, such as care homes and offices.</p> <p>A key part of NHSPS' role relates to the provision of new healthcare facilities with the goal of ensuring that the healthcare needs of communities can be met. NHSPS works with commissioners to identify and respond to local property needs. As such, it is involved in the acquisition and development of new facilities, and the redevelopment of existing facilities. Another important aspect of NHSPS' role is to dispose of facilities that have been identified as surplus to NHS requirements by commissioners.</p> <p>Representation</p> <p>At this stage of the Local Plan process, London Borough of Richmond upon Thames is asking for feedback on how the borough should accommodate growth and plan for new development. In this regard, NHSPS have reviewed the document and respond to the document through the below comments.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p><b>Securing new social and community infrastructure to support a growing population</b>  <b>Question: Continue to have firm policies to resist the loss of existing facilities, and to require the site to be considered for other types of community facilities before being released for other uses.</b></p> <p>The document considers the policy direction associated with community infrastructure and sets out that the London Borough of Richmond upon Thames will ‘continue to have firm policies to resist the loss of existing facilities, and to require the site to be considered for other types of community facilities before being released for other uses’.</p> <p>In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services improve the quality of care and ensure that the estate is managed sustainably and effectively.</p> <p>NHSPS’s Property Strategy team has been supporting Clinical Commissioning Groups and Sustainability and Transformation Plan groups to look at ways of better using the local health and public estate. This will include identifying opportunities to reconfigure the estate to better meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites emerging from this process.</p> <p>The ability of the NHS to continually review the healthcare estate, optimise the use of land, and deliver health services from modern and fit for purpose facilities is crucial.</p> <p>It is important to note that there are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any part of or all of a property being declared surplus. This often includes extensive public consultation on any proposed service relocations.</p> <p>Given that there is very careful oversight from NHS England and CCGs to ensure sufficient services are provided, and that the estate is fit-for-purpose, additional protection through planning policy should be unnecessary in relation to public healthcare facilities.</p> <p>Whilst Paragraph 92 of the Revised NPPF states that planning policies and decisions should ‘guard against the unnecessary loss of valued facilities and services’, the overarching objective of this same paragraph is to ensure the delivery of facilities and services for the community.</p> <p>Finally, any policy should make provision for the circumstances envisaged at paragraph 3.87A of the London Plan so that where public facilities are no longer needed the proceeds from the sale of those facilities / land can be invested in public facilities; not to do so could cause viability and / or funding issues, particularly given the requirement for the NHS to maximise receipts from the sale of surplus facilities and land.</p> <p>Additionally, The London Plan, in the supporting text for Policy 3.17 explicitly recognises the role of NHS PS in ensuring that surplus sites are released for other uses as part of the reorganisation of the NHS estate, which is taking place so that services can be provided more efficiently. The draft new London Plan is likely to go further, and proposed Policy S2 states that Boroughs should work with the NHS to “identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses”.</p> <p>For the above reasons, any policy linked to the loss of community or health uses should be appropriately qualified so that it does not present an unnecessary or unreasonable hurdle to health service provision reconfiguration.</p> <p><b>Question: Continue to ensure that the impact of large new development is assessed, so that the impact of additional burdens on existing facilities is mitigated.</b>  When preparing Local Plans, Local Authorities should be tasked with a specific duty to co-operate with the NHS to facilitate its estate planning functions and delivery. We therefore support the requirement to ‘work closely with our partners to identify and meet people’s needs’.</p> <p>It is vital that boroughs work with NHS organisations to plan for healthcare facilities to meet the needs of Richmond’s future population. The explicit requirement for Local Authorities to collaborate with the NHS is welcomed. We would encourage the inclusion of health providers being actively involved in the preparation of their local plans, as this will help to enable the NHS to provide a comprehensive healthcare service to Richmond’s growing population.</p> <p>When preparing local plans, Local Authorities should be tasked with a specific duty to co-operate with the NHS to facilitate its estate planning functions and delivery.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>Local Planning Authorities should ensure that they work with NHS commissioners and providers to ensure that adequate healthcare infrastructure is provided to support new residential development. Healthcare facilities (including primary and secondary care) are essential infrastructure and where new facilities are required, they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. LPAs should therefore work with NHS commissioners and providers to consider the quantum and location of healthcare facilities that will be required to ensure that new developments are sustainable.</p> <p>Summary: The proposed changes would ensure that the NHS is able to effectively manage its estate, disposing of unneeded and unsuitable properties where necessary, to enable healthcare needs to be met.</p> <p>An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies. NHS PS support more flexible policies that enable the NHS Commissioners conclusions to be acted upon where surplus land is identified, for the benefit of the local community and the NHS for the shared aim to provide essential services.</p> <p>Where NHS Commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a policy presumption that such sites are suitable for housing (or other appropriate uses). It is imperative that NHS sites are not subject to overly onerous policies, particularly when the NHSPS is pressured by the White Paper and DCLG to deliver more housing. It also has a statutory duty to help finance improved healthcare services and facilities nationally through the disposal of their sites.</p>
41	Anthony Swan	Protected housing as proposed Udney Park
42	Jeremy Gill	Like Ellera Hall you mean? Yes. Leave it alone.
44	Roger Cutler	Sporting, or other provision, for teenagers
45	Sally Beeson	With an ageing population, a community space for the elderly is vital, as is nursery provision but at a minimal cost to parents
46 (a)	Joan Gibson	<p>Parks can provide local community infrastructure with high quality 2-storey Pavilions without any loss of green space. In Whitton both Heathfield rec and Murray Park have areas which are currently a hut or shipping container. Perfect for development to high quality Pavilions with community space for nurseries, life enhancing classes, music etc.</p> <p>Large Developments should include community and business space rather than retail.</p>
56	Trevor Rowntree	Yes. In my area we need a Public House which is a very effective community facility.
50	John O'Brien	Youth centres
51	Su Bonfanti	We have good community facilities here, so the important thing is sustaining ETNA, as well as the existing tennis, cricket and bowls facilities. Some of those are private but they do increasingly offer services to the community as a whole.
52	Winston W Taylor	I think Teddington is lucky with its community facilities. This is subject to the Ellera Hall consultation that rightly proposes a new facility providing additional community services.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Emergency housing for rough sleepers with medical , social and phycological support.
55	Jon Rowles	<p>Heathfield Recreation ground needs its pavillion rebuilding.</p> <p>The 1970s one was burnt down and was replaced with a prefabricated building which was a lot smaller and proves only the most basic of facilities. The LBRUT playing pitch strategy on page 14 states that local sports teams view this as having poor quality old and dated facilities.</p>
56	Rob Kennedy, Environment Agency	No
57	Tom Clarke, Theatres Trust	It should be ensured, as referenced within this section, that strong policies protecting facilities are carried forward. It should be made clear such policies apply to cultural facilities and venues such as theatres, cinemas and music venues. This will ensure consistency with London Plan and NPPF policy.

Respondent reference no.	Name / Organisation	Detailed comments
58	Michael Atkins, Port of London Authority	As part of the revised Local Plan there must be continued support for the protection and expansion of river related sports and recreation facilities in the borough. The PLAs Thames Vision includes the goal to see greater participation in sport and recreation on and alongside the river by 2035 and the London Borough of Richmond Upon Thames, with it's large number of existing facilities can play a key part in achieving this aim.
63	Carol Rawlings	Ham already has a good range of community facilities.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Maintaining ETNA as a community group is essential.
68 (b)	Mark Jopling	Council takes too long to make decisions eg North Lane/Ellaray Hall Teddington, years of indecision serves no-one.
69	Geoff Bond on behalf of Ham and Petersham Association	Improved football and cricket facilities
<b>What is the best way to provide enough school places for our growing population?</b>		
18	Phoebe Juggins, Department for Education	<p>1. The Department for Education (DfE) welcomes the opportunity to contribute to the development of planning policy at the local level.</p> <p>2. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and DfE is the delivery body for many of these, rather than local education authorities. However, local education authorities still retain the statutory responsibility to ensure sufficient school places, including those at sixth form, and have a key role in securing contributions from development to new education infrastructure. In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. We have published guidance on securing developer contributions for education, at <a href="https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth">https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth</a>. You will also be aware of the corresponding additions to Planning Practice Guidance on planning obligations, viability and safe and healthy communities.</p> <p>6. The National Planning Policy Framework (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 94).</p> <p>7. DfE supports the principle of LBRuT safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 94 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, in accordance with Planning Practice Guidance and DfE guidance on securing developer contributions for education (<a href="https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth">https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth</a>). We would be happy to share examples of best practice.</p> <p>8. LBRuT 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 Planning for Schools Development (<a href="https://www.gov.uk/government/publications/national-planning-policy-framework-2">https://www.gov.uk/government/publications/national-planning-policy-framework-2</a>) (2011) which sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system.</p> <p>9. In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 24-27)(NPPF paragraph 24-27 specifies that this collaborative working should include infrastructure providers), DfE encourages close working with local authorities 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. Please add DfE to your list of relevant organisations with which you engage in preparation of the plan.</p> <p>10. Please note that there are two routes available for establishing a new school. Firstly, a local authority may seek proposals from new school proposers (academy trusts) to establish a free school, after which the Regional Schools Commissioner will select the successful trust. Under this 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and managing the build process. Secondly, school proposers can apply directly to DfE during an application round or 'wave' to set up a free school. The local authority is less involved in this route but may support groups in pre-opening and/or provide a site. Either of these routes can be used to deliver schools on land that has been provided as a developer contribution. DfE has published further general information on opening free schools. (<a href="https://www.gov.uk/government/collections/opening-a-free-school">https://www.gov.uk/government/collections/opening-a-free-school</a>)</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p><b>Site Allocations</b></p> <p>11. Site allocations and/or associated safeguarding policies should seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. It is important that social infrastructure is in the right place at the right time to support population growth.</p> <p>12. Viability assessment should inform options analysis and site selection, with site typologies reflecting the type and size of developments that are envisaged in the borough/district. This enables an informed judgement about which developments would be able to deliver the range of infrastructure required, including schools, leading to policy requirements that are fair, realistic and evidence-based. In accordance with Planning Practice Guidance, there should be an initial assumption that applicable developments will provide both land and funding for the construction of new schools. The total cumulative cost of complying with all relevant policies should not undermine deliverability of the plan, so it is important that anticipated education needs and costs of provision are incorporated at the outset, to inform local decisions about site selection and infrastructure priorities (PPG on viability and planning obligations: <a href="https://www.gov.uk/government/collections/planning-practice-guidance">https://www.gov.uk/government/collections/planning-practice-guidance</a>).</p> <p>13. While it is important to provide this clarity and certainty to developers and the communities affected by development, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. DfE therefore recommends the Council consider highlighting in the next version of the Local Plan that:</p> <ul style="list-style-type: none"> <li>- specific requirements for developer contributions to increasing capacity of existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that</li> <li>- requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.</li> </ul> <p><b>Evidence Base</b></p> <p>14. It would be good practice for LBRuT to continually monitor the position with regards to pupil places and school delivery, as part of ensuring the Infrastructure Delivery Plan is up to date, setting out clearly how the forecast housing growth at allocated sites has been translated (via an evidence based pupil yield calculation) into an identified need for specific numbers of school places and new schools over the plan period, and also how this compares to what has been delivered practically. This would help to demonstrate that the approach to the planning and delivery of education infrastructure is justified based on proportionate evidence, and also to ensure that approaches can be flexible and resilient to changes in circumstances and the reality of the delivery of housing.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Schools need to be located within their catchment areas with space them to allocated in the local plan. A full public sequential site search process should be undertaken to identify new sites so that the selection is as open and democratic as possible.
31	Tim Catchpole on behalf of MESS	We are over-provided with primary school places and possibly also with secondary school places given the significant decline in the birth rate since 2012.
33	Tim Catchpole on behalf of the Mortlake Brewery Community Group	<ol style="list-style-type: none"> <li>1. Don't over-react when there is a sudden dramatic increase in births - like there was in 2008-2012. We have witnessed strenuous attempts by the Council to respond to this by providing a huge increase in school places, but it has turned out to be a bulge and the birth rate since 2012 has been falling steadily. Primary schools are now experiencing a significant decline in numbers and the latest ONS population projections (published 24 March 2020) show that the population of 11-year-olds in Richmond will peak in 2021 (and in neighbouring boroughs in 2023) and then go into significant decline.</li> <li>2. Don't support the development of a new secondary school on an inappropriate site just because it is being offered by the DfE with all expenses paid. Recognise that while over-provision of primary or lower secondary school places does not damage the educational offer, over-provision post-16 could prevent existing schools from achieving viable 6th forms (indeed a new school might not be able to achieve viability of its own 6th form). Instead, negotiate with the DfE to allow existing secondary schools to expand in order to achieve such viability and get the DfE to fund such expansion.</li> <li>3. If, and <i>only if</i>, a new school is really needed, then make sure the right site is selected using the ten criteria set out in the Mayor's New London Plan covering accessibility by public transport, linkages to pedestrian/cycle networks, proximity to open space, etc, supplemented with additional criteria covering impact on</li> </ol>

Respondent reference no.	Name / Organisation	Detailed comments
		existing schools and on protected land, noting that MOL is no longer sacrosanct. The case for the new school must be robust and evidenced (as requested by the GLA). 4. Carry out more detailed research into the percentage of pupils going into independent education in different areas of the borough, and the factors affecting this choice. It is not adequate to apply a fixed percentage of the state primary-school leavers, across large areas of the borough. 5. Do not accept that, just because secondary schools and colleges are no longer funded by the Local Authority, the authority has no responsibility for asserting what their role should be in relation to one another. In particular, it has a duty to do what it can to ensure on behalf of residents that there is the best possible <u>pattern</u> of educational provision, particularly post-16 where an adequate range of courses should be reliably available. This is not the case at present.
41	Anthony Swan	Restrict new builds
42	Jeremy Gill	Build some schools.
44	Roger Cutler	Inject more money by reducing the money you waste elsewhere eg. yet more plans & expenditure on Twickenham Riverside which works fine as it is.
45	Sally Beeson	Find a site on which to build a new school - local authorities should have the power to overrule proposed planning for flats for this reason. Also to expand existing school buildings as long as playgrounds and playing fields are not built upon and reduced in size, which has been the fate of many of our local schools. Use adjacent boroughs' schools if their school places aren't filled
46 (a)	Joan Gibson	School places. There are a number of schools that can be expanded. Twickenham School, Hampton High, Heathfield school, Nelson school is 30 pupils down etc. etc. You need to stop your policy of expanding via new schools. This is removing potential sites from housing development and worse still removing green sites from Richmond. Your policy should be to expand on current school brown field sites rather than open new schools. This also ensures the school places are in the area of need so encourages active travel.
53	Richard Woolf on behalf of McDaniel Woolf Architects	The borough is providing new schools . The new school places will respond in the future to an increasing population. No doubt relocation of metropolitan open land by Richmond Council will take place, as happened at the Russell School in Petersham. With this site, a new school was built in an inappropriate location, against local opposition and with poor strategic thinking. If precious MOL and place space is to be lost, please learn from the Russell project on what not to do.
55	Jon Rowles	1) The council can use its influence to amend catchment areas. Currently, around a third of secondary school places are taken up by out of borough pupils and this is also causing a lot of extra congestion and pollution. 2)The council need to find sites for new schools and reserve them using the local plan process as most local authorities do. 3) Schools must be located in their main catchment area to make them sustainable
56	Rob Kennedy, Environment Agency	By building more schools or expanding existing schools.
63	Carol Rawlings	Expand the current private provision by providing free school places for children.
69	Geoff Bond on behalf of Ham and Petersham Association	Only introduce additional need where the school places can be satisfied. Do not over stretch existing schools but use existing capacity elsewhere by focusing development near this capacity.
<b>Should we encourage more community uses in borough centres?</b>		
Of respondents who answered the question: 19 said yes, 1 said no and 2 don't know [16 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<i>[Should they be encouraged as part of larger or mixed-use developments?]</i> Depends on the size of the town centre – it could jeopardise the viability of smaller town centres to lose even more units. Should consider making it easier for gym chains to open up in our town centres. It easier to open up a vape store or cake shop than open a facility that improves peoples health.
31	Tim Catchpole on behalf of MESS	Not necessarily in the borough centres - churches provide floorspace for community uses.
41	Anthony Swan	Should be encouraged anywhere

Respondent reference no.	Name / Organisation	Detailed comments
42	Jeremy Gill	Possibly, first sensible question you've asked
44	Roger Cutler	Whatever works best. Must be versatile.
56	Trevor Rowntree	But the community uses should ensure they are for the whole community and not be exclusively for use for a subsection of the community.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Both
53	Richard Woolf on behalf of McDaniel Woolf Architects	I'm not sure who 'community' is ??
55	Jon Rowles	But not at the expense of retail.
63	Carol Rawlings	Mixed us
<b>Should there be increased public access to school facilities?</b>		
Of respondents who answered the question: 17 said yes, 2 said no and 3 don't know [16 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	All new school developments should have a community use agreement for access to sports facilities, classrooms, etc – so should the demand arise in the future it can be accommodated. With schools increasing separate from the council, these agreements will need to be more formalised in the future.
31	Tim Catchpole on behalf of MESS	Schools have become like fortresses, so this may be unrealistic.
42	Jeremy Gill	Evening classes
44	Roger Cutler	Once again, more expenditure.
45	Sally Beeson	I think they are used already, and there comes a tipping point whereby the school isn't for the children alone, which I think it should be. It's a special and safe place for many and security could be compromised.
46 (a)	Joan Gibson	Not unless you are going to provide the staff to run them out of hours - schools cannot afford this
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Including independent schools
51	Su Bonfanti	I support the idea of 'increased public access to school facilities'. We're about to have a whole new school - the biggest bit of infrastructure in East Twickenham for years - and it would be good for it to be well used.
52	Winston W Taylor	The school facilities should be available to the public.
53	Richard Woolf on behalf of McDaniel Woolf Architects	I feel access is well served with many schools. Not sure we have a challenge ?
55	Jon Rowles	There needs to be community use agreements for not just sports facilities but the classrooms too.
63	Carol Rawlings	School swimming pools should be available for public use at weekends and holidays.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Yes where relevant and if it doesn't generate more disruptions from nearby residents.

Respondent reference no.	Name / Organisation	Detailed comments
69	Geoff Bond on behalf of Ham and Petersham Association	Extend the K5 to Grey Court School. Discourage teachers from driving to school
<b>General comments relating to this topic area</b>		
4	Lambert Smith Hampton on behalf of Metropolitan Police Service	<p><b>Section 106/CIL contributions to mitigate impact on crime</b></p> <p>We are pleased to see that Richmond Council references ‘policing and other criminal justice or community safety facilities’ as social infrastructure within the adopted Local Plan. As noted in our representation to the Richmond Planning Obligations SPD Consultation in January 2020, the MPS have to move towards securing S106/CIL from development due to the impacts on crime. The MPS would like to have the ability to receive financial contributions in due course and are in the process of working up a formula linking to development impacts which should be available soon.</p> <p>A breakdown of non-property related infrastructure sought by the MPS in the future is detailed below. This list has been taken from other Police and Crime Commissioners who are already receiving financial contributions;</p> <ul style="list-style-type: none"> <li>• <b>Staff set up costs</b> <ul style="list-style-type: none"> <li>- Uniforms.</li> <li>- Radios.</li> <li>- Workstation/Office equipment.</li> <li>- Training.</li> </ul> </li> <li>• <b>Vehicles</b> <ul style="list-style-type: none"> <li>- Patrol vehicles.</li> <li>- Police community support officers (PCSO) vehicles.</li> <li>- Bicycles.</li> </ul> </li> <li>• <b>Mobile IT:</b> The provision of mobile IT capacity to enable officers to undertake tasks whilst out of the office in order to maintain a visible presence.</li> <li>• <b>CCTV technologies:</b> Automatic Number Plate Recognition (ANPR) cameras to detect crime related vehicle movements.</li> <li>• <b>Police National Database (PND):</b> Telephony, licenses, IT, monitoring and the expansion of capacity to cater for additional calls.</li> </ul> <p><b>Text secured within the draft Wandsworth Planning Obligations SPD</b></p> <p>The MPS have secured the following text within the draft Wandsworth Planning Obligations SPD;</p> <p>‘The impact of large-scale development on the Metropolitan Police has funding implications, and it is widely accepted that policing infrastructure can be included within CIL and s106 obligations. S106 infrastructure is not limited to buildings and could include equipment such as surveillance infrastructure, CCTV; staff set up costs, vehicles, mobile IT and Police National Database. The Metropolitan Police is currently preparing a calculation formula to enable collection of financial contributions and this will be used when available by the Council’.</p>
14	Mayor of London	The themes regarding new social and community infrastructure, creating safe, healthy and inclusive communities are closely aligned with the Mayor’s Good Growth Objective GG1, Building strong and inclusive communities. The intended approach is welcome.
18	Phoebe Juggins, Department for Education	<p>5. DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure on p12.</p> <p><b>Location of Social Infrastructure</b></p> <p>15. <a href="#">As set out above, site allocations for educational uses</a> (new schools and facilities as well as expansions) should be robustly evidence-based and ensure that the plan is positively prepared. It is also important that there is a positive planning policy framework to ensure that education provision can come forward during the plan period expediently, to respond flexibly to need and demand.</p> <p>16. It can be challenging for sites to be identified for the delivery of social and community infrastructure, including education uses. DfE would recommend that LBRuT does not take an onerous position requiring significant policy tests to be met for changes of use from other land uses to social and community uses (including education). For example, marketing evidence requirements for releasing land can lead to social infrastructure and education uses being unable to be delivered in line</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>with need and demand. It is important that there is flexibility within types of social infrastructure to enable best value for money for public services and agencies delivering these.</p> <p>17. Such policy requirements can also be challenging to the public sector/third sector organisations required to meet the tests, given the intensity of resource and timescales involved. This places additional burden on such organisation who are already frequently stretched and need to be able to realise value for money and efficiency.</p> <p>18. All new development can cumulatively impact on the requirement for social infrastructure facilities, not just <i>large</i> new development as referenced on page 55. DfE therefore recommends that a policy approach be developed to ensure that all development which either standalone, or in conjunction with other planned or proposed development, is assessed to ensure that proportionate contributions are secured to mitigate any impact that may arise. This could be contributions towards existing facilities' expansion or enhancement, or a proportionate contribution towards new provision.</p>
18	Phoebe Juggins, Department for Education	<p><b>Forward Funding</b></p> <p>23. DfE loans to forward fund schools as part of large residential developments may be of interest, for example if viability becomes an issue. Please see the Developer Loans for Schools prospectus for more information (The Developer Loans for Schools prospectus is available here -<a href="https://www.gov.uk/government/publications/developer-loans-for-schools-apply-for-a-loan">https://www.gov.uk/government/publications/developer-loans-for-schools-apply-for-a-loan</a>). Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of schools where and when they are needed.</p> <p><b>Developer Contributions and Community Infrastructure Levy (CIL)</b></p> <p>24. One of the tests of soundness is that a Local Plan is 'effective', meaning the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. DfE notes that LBRuT will be producing an Infrastructure Delivery Statement which will reflect Local Plan priorities (set out on page 59), and that the Council may also wish to review CIL rates to ensure appropriate rates are levied and the right infrastructure is secured across the borough.</p> <p>25. Where additional need for school places will be generated by housing growth, the Infrastructure Delivery Statement should identify the anticipated CIL and Section 106 funding towards this infrastructure. The statement should be reviewed annually to report on the amount of funding received via developer contributions and how it has been used, providing transparency to all stakeholders.</p> <p>26. Local authorities have sometimes experienced challenges in funding schools via Section 106 planning obligations due to limitations on the pooling of developer contributions for the same item or type of infrastructure. However, the revised CIL Regulations remove this constraint, allowing unlimited pooling of developer contributions from planning obligations and the use of both Section 106 funding and CIL for the same item of infrastructure. The advantage of using Section 106 relative to CIL for funding schools is that it is clear and transparent to all stakeholders what value of contribution is being allocated by which development to which schools, thereby increasing certainty that developer contributions will be used to fund the new school places that are needed. DfE supports the use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development, consistent with Regulation 122 of the CIL Regulations.</p> <p>27. We also request a reference within the Local Plan's policies or supporting text to explain that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth. An example of this would be the local authority's expansion of a secondary school to ensure that places are available in time to support development coming forward. This helps to demonstrate that the plan is positively prepared and deliverable over its period.</p> <p>28. DfE would be particularly interested in responding to any update to the Infrastructure Delivery Plan/Infrastructure Funding Statement, viability assessment, Obligations SPD or other evidence relevant to education which may be used to inform local planning policies and CIL charging schedules. As such, please add DfE to the database for future consultations on relevant plans and proposals.</p> <p><b>Conclusion</b></p> <p>29. Finally, I hope the above comments are helpful in shaping LBRuT's Local Plan, with regard to the provision of a policy approach, site allocation and contributions strategic to securing school places. Please advise DfE of any proposed changes to the approach to emerging Local Plan policies, supporting text, site allocations and/or evidence base arising from these comments.</p>

Respondent reference no.	Name / Organisation	Detailed comments
22	Jimmy Wallace, Richmond Athletic Association	<p>We are fully supportive of the borough's intention to update the following aspects of its evidence base as outlined on p. 54:</p> <ul style="list-style-type: none"> <li>• Indoor Sports Facility Needs Assessment;</li> <li>• Playing Pitch Assessment;</li> <li>• Playing Pitch Strategy; and</li> <li>• Open Space Assessment</li> </ul> <p>We would welcome the opportunity to input into the development of these strategies and assessments, particularly in the context of our emerging masterplan for the enhancement of the existing facilities at the Richmond Athletic Ground.</p> <p>We also note the various policy directions, including the support for the enhancement of existing land and facilities for sport and playing fields, and we look forward to reviewing the detailed policies as these emerge in draft.</p>
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	We support the essential provision of schools, care and other community facilities.
<p><b>Creating safe, healthy and inclusive communities</b></p> <p><b>Do you agree with the proposed policy directions?</b></p> <p>Of respondents who answered the question: 15 said yes, 4 said no and 3 don't know [16 did not answer the question]</p>		
20	Gary Backler, Friends of the River Crane Environment.	<p>Again, we welcome the inclusion of this theme and its prioritisation, but again we are concerned that the emphasis is inappropriate. As set out, the policy places importance on aspects such as Healthy Streets, fastfood outlets, sports and health facilities. This is inadequate: for example, "providing access to sports centres and recreation facilities" (p58) that require user payments risks being regressive and exclusionary in both health and financial terms.</p> <p>We believe that greater emphasis should be placed on the role that the borough's open and wild spaces can play in creating safe, healthy and inclusive communities, as well as in improving air quality and promoting physical and mental health. These open spaces should be accessible to communities without the need to overcome severance obstacles. They should not be over-exploited and degraded by excess demand. They should be freely available to the public. Crucially, the policy needs to recognise that these open spaces should be of high – and improving – quality, with the commitment that safety, cleanliness, reduction in crime and anti-social behaviour, management and maintenance will have equal priority for the open spaces as for the built environment.</p> <p>We help to support three TCV Green Gyms in the borough, provide a programme of Walks &amp; Talks and conduct usage surveys which quantify the use made of some of the borough's open spaces. There is considerable work of this nature being done by a network of volunteer based organisations across the borough and we believe this work needs to be more actively supported by the council. Organisations such as South West London Environment Network help to support and co-ordinate these activities, working with a network of over 70 friends groups across the borough.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to ensure that public health is an official consultee – par the Lib Dem Manifesto.
37	John Waxman, Crane Valley Partnership	<a href="#">Furthermore</a> the revised Local Plan must recognise that convenient access to a Borough-wide network of connected high quality open spaces offers significant benefits to residents - for example in terms of enhanced health and well-being and opportunities for sustainable travel.
46 (a)	Joan Gibson	Health – I feel your summary of what is causing ill health in Richmond, high levels of obesity and risky behaviour in adolescents misses out the reasons. You seem to only blame it on smoking, alcohol drinking, drug taking and air quality. I live in a middleclass area of Whitton, both adults in our household are fit and healthy for our age, and our child is normal weight fit and healthy, and does not drink. We drink more than 14 units a week, used to smoke and breath in poor air quality so should not be fit and healthy. We have neighbours who are must less fit and healthy, and have overweight children but do not drink as much as we do. You need to get to

Respondent reference no.	Name / Organisation	Detailed comments
		the bottom of what is making these families less fit despite less alcohol and the same air quality. If you do not understand why you will fail to put the right changes in place.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
55	Jon Rowles	A lot of health inequalities are down to 'cold houses' and more need to be done to ensure that the poor and elderly are not in substandard housing.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	There needs to be a greater focus on mental health in context of general wellbeing of residents in the borough. Noise disruption is high and is not given any focus when considering new developments. The borough needs to include noise pollution as a key issue in the borough (likely to increase if Heathrow 3rd runway goes ahead). In East Twickenham, our high street is very noisy (vehicles, businesses operating, buses, etc.) and we are also plagued by heavy air traffic. This could become a significant health issue beyond obesity, etc. which are already tackled by national policies.
65	SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited	Numerous studies (Marmot, Michael et al; (2010) 'Fair Society, Healthy Lives' The Strategic Review of Health Inequalities in England post-2010, p.132 and Williams, J et al (2014) 'A systematic review of the influence of the retail food environment around schools on obesity-related outcomes ' Obesity Reviews 15, p.374) have found no or conflicting evidence for any effect of the food environment around schools on childhood obesity. Controlling the primary school environment is particularly problematic as there is neither correlation nor mechanism, since pupils may not leave unattended.
69	Geoff Bond on behalf of Ham and Petersham Association	The most popular way to improve health is by recreational walking. By improving the areas used for recreation walking, such as the Avenues in Ham and Petersham more people will walk. You don't need buildings for this
<b>Should it be easier to change use from other land uses to community uses?</b>		
Of respondents who answered the question: 9 said yes, 2 said no and 7 don't know [20 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Some "community uses" don't have much local community value. There is a unit in Whitton which is occupied by a postal pharmacy and thus could be located anywhere and just removes a retail unit.
41	Anthony Swan	Buildings then yes
44	Roger Cutler	Depends on need.
55	Jon Rowles	Depends what the use is. School use could be very controversial and cause lots of pollution.
63	Carol Rawlings	Unused retail spaces should be changed to community use.
68 (a)	Mark Jopling	Yes though not green space unless related to functional use of that green space
68 (b)	Mark Jopling	Yes though anything built on green space must be related to the function of the green space
<b>Should policy strongly resist more takeaways in areas in proximity to schools?</b>		
Of respondents who answered the question: 15 said yes, 2 said no and 2 don't know [19 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Some council go further and ban additional all additional takeaways in wards where childhood obesity is above a certain level. The council could also try and reduce adverting on and around fast food units – as its walking past what are effectively bill-boards promoting bad eating which is the biggest part of the problem The council could look at preventing banner advertising on barriers around outside eating areas, and posters that are allowed in the window. The council should consider wider restrictions to prevent what Unicef call 'food swamps' from developing. In some wards we are in danger of seeing the majority of children eating poor diets. Please see this link <a href="https://www.unicef.org.uk/press-releases/poor-diets-damaging-childrens-health-warns-unicef/">https://www.unicef.org.uk/press-releases/poor-diets-damaging-childrens-health-warns-unicef/</a>
41	Anthony Swan	Provide free school lunches where students can sit and talk...like in France. No phones allowed on!
44	Roger Cutler	But money talks.
45	Sally Beeson	Absolutely, the obesity figures speak for themselves!

Respondent reference no.	Name / Organisation	Detailed comments
52	Winston W Taylor	Health; behaviour
53	Richard Woolf on behalf of McDaniel Woolf Architects	Although I support the principle , I also feel this is a democracy. I know chip-shops opposite school gates isn't ideal , but I would prefer democracy over calories. Sorry, not very PC.
55	Jon Rowles	The planning inspector is undermining the current policy, so many look into also having a bar on new takeaways where over a certain percentage of children are overweight (which is also commonly used).
63	Carol Rawlings	Encourage healthy eating. Discourage confectionery, fast food and chips!
65	SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited	Banning a specific type of food and drink use within effectively random areas rather than the total number or proportion of all food and drink premises, is unlikely to be beneficial, but likely to contradict wider retail policy by reducing accessibility and therefore footfall, vitality and, ultimately, viability. Recent evidence (Robinson, E et al, 2018. '(Over)eating out at major UK restaurant chains: observational study of energy content of main meals' BMJ 2018 (363) 4982) demonstrates that over-consumption is possible at premises and brands within a wide range of planning use classes, so that action to improve, rather than restrict, the offer is required across all uses where food and drink are sold, particularly where this is for immediate consumption.
<b>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?</b>		
10	Stuart Morgans, Sport England	<p>Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.</p> <p>Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.</p> <p>We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local planning policies, and applied in development management. Please see our website for more advice: <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/">http://www.sportengland.org/facilities-planning/planning-for-sport/</a></p> <p><b>Protecting playing fields and other sport facilities</b></p> <p>Sport England is keen to ensure that there is a relevant policy within any new Local Plan in order to ensure that both indoor and outdoor sport facilities are adequately protected in line with both the London Plan (Intend to Publish version 2019) and the NPPF 2019.</p> <p>I note that the existing Richmond Local Plan LP31 states that playing fields and sports facilities should be protected and where possible enhanced. However, both national policy and the London plan reference specific exceptions to this. A new Local Plan should consider bringing this policy into line with the NPPF and London Plan.</p> <p>National policy currently states: Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</p> <p>The London Plan (Intend to Publish 2019) states: Existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless: 1) an assessment has been undertaken which clearly shows the sports and recreational land or facilities to be surplus to requirements (for the existing or alternative sports and recreational provision) at the local and sub-regional level. Where published, a borough's assessment of need for sports and recreation facilities should inform this assessment; or 2) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or 3) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>Sport England considers that this is an excellent opportunity to ensure that any new Local Plan is compliant with both the London Plan and NPPF. Sport England are likely to object if the relevant policies in the new Local Plan are inconsistent with the guidance contained within the NPPF (particularly para 97), and Sport England's Playing Fields Policy (see attached link).  <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</a></p> <p>Sport England may also wish to comment further on any policy that relates to protecting sport following the Inspectors decision into the Udney Park Road appeal Inquiry, where the implications of Richmond's existing policy around sport facilities may well become clearer.</p> <p><b>New provision</b>  Sport England supports the element of policy LP31 relating to provision to meet the needs of major development, as it references assessing need in line with the Borough's Playing Pitch Strategy (PPS). Sport England suggests that a revised policy should identify a mechanism for calculating demand from new developments and set out how this is to be applied to establish the level of onsite/off-site provision for both indoor and outdoor facilities. For example, the use of Sport England's Sports Facility Calculator and New Playing Pitch Calculator, which provide a useful starting point to demonstrate demand generated by new housing development. Should an on-site contribution not be deemed appropriate, the policy should provide for an off-site contribution. The Playing Pitch Strategy Action Plan should to be used to identify sites requiring investment where appropriate.</p> <p><b>Evidence base</b>  I note that the Council benefits from a relatively recent PPS updated in 2018; now is a good opportunity to consider beginning the process of updating this document in order to ensure that the information in it remains robust and up-to-date in accordance with para 96 of the NPPF. I further note that the Council has not updated its evidence base with regard to indoor facilities since 2015 and would therefore strongly encourage that the Council develop an updated/new Built Facilities Strategy (BFS). It is essential that the Council has an up-to-date PPS and BFS in order to ensure that the new Local Plan evidence base in order to comply with national policy guidance. The lack of an up to date evidence could lead to the new Local Plan being found to be unsound.</p> <p><b>Health and wellbeing – Active Design</b>  Sport England believes the new Local Plan would benefit by specifically referencing Sport England's Active Design Guidance, with the recommendation that future design proposals follow its principles.  Sport England and Public Health England have refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity. Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into policy and any new developments – please see website extract and link below:</p> <p>Active design  We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active. Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.  That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.</p> <p>Ten principles  The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.  The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design. <a href="http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design">http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design</a>
18	Phoebe Juggins, Department for Education	<b>Open space and recreation</b> 19. The NPPF (2019) sets out at paragraph 97 that: <i>97. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</i> <i>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i> <i>b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i> <i>c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</i> 20. It is important that the LBRuT Local Plan allows flexibility to allow the provision of educational facilities, where there is a clear overall benefit in terms of enhanced facilities provision (taking into account local needs), despite a limited loss in the quantity of existing facilities, such as a new school providing indoor and outdoor facilities for sport of significantly improved <i>quality</i> , accessibility and availability for shared use by the local community (secured through a community use agreement if appropriate). It should be acknowledged that enhancements can take the form of both quality as well as quantity and as such, any quantitative loss may be more than compensated by qualitative enhancements. This flexibility will enable greater benefits to health and wellbeing. 21. Any future policy should comply with the NPPF. 22. DfE additionally notes that LBRuT intends to produce/update relevant evidence base in relation to playing pitches and open space, and therefore we suggest that assessments (in accordance with the proposed abovementioned point regarding policy direction) should consider qualitative factors (for both existing condition and proposed need) as well as the quantity of open space in existence and proposed. This will ensure that the policy approach is founded on robust and comprehensive evidence.
22	Jimmy Wallace, Richmond Athletic Association	We endorse the proposed policy directions to support the creation of safe, healthy and inclusive communities. Particularly, we fully endorse the borough's prioritisation of healthy communities and we recognise the opportunity for the enhancement of the Richmond Athletic Ground facilities to contribute to meeting this priority through the provision of improved sport and recreation facilities.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Some new developments don't have pavements and people have to walk on the roadway. Whilst this may slow cars down, it also means that parents are more reluctant to let their children travel unaccompanied. <b>[See photo in Appendix]</b> <b>Arden Close in Whitton – and example of lack of pavements discouraging exercise</b> The Infrastructure Delivery Plan notes that membership at fitness clubs is falling and that borough residents are now traveling outside of the borough to access no-frills gyms (such as the gym group Hounslow where monthly subs are £18.99 with no contract) compared to the legacy chains like Virgin Active Twickenham (£99 per month for a 12 month contract), Nuffield Health Twickenham (£69.00 per month for a 12 month contract) and David Lloyd (£120 per month for a 12 month contract + 3 month notice to cancel). We recommend that council look to ensure that more low-cost gyms can be set up in the borough.
31	Tim Catchpole on behalf of MESS	No, the Borough is well provided with space for a healthy life style. Certain residents appear not be taking advantage of them?
41	Anthony Swan	Yes..protected bike lanes. Use school gyms for sport clubs.
42	Jeremy Gill	Not your concern at all
44	Roger Cutler	More money needs to be spent on health. The availability of prescription drugs should be improved rather than money spent on weight loss & active lifestyles. Existing basic care needs money before those things
45	Sally Beeson	Playgrounds and school playing fields are vitally important Keep our open spaces green
46 (a)	Joan Gibson	I recommend you look at: Diet – how many calories and what sort of calories these families eat. Do parents pickup children from school and give them a chocolate bar, do the children get

Respondent reference no.	Name / Organisation	Detailed comments
		<p>driven to school, does the whole family rely on cars, how big are their portions, is the child addicted to fats and sugar etc. etc. A child / adult that gets obese finds it hard to exercise. Why are teenagers in Richmond drinking more than average? Lack of self-esteem??, lack of hobby or interest caused be lack of self-esteem?? It tends not to be lack of opportunities as Richmond has a huge leisure offer and schools give children all they could possibly dream of.</p> <p>To get people more active you need to focus on separate walking, public transport and cycling routes with cars given limited routes. This needs to be for ALL areas of Richmond (not just the ones where people walk and cycle a lot now). In fact, priority needs to be given to those areas with the least active travel.</p> <p>I like that you want to engage with youth. However, the youth parliament which is full of successful and motivated teenagers will not have a clue what makes children obese, drink, smoke and take drugs. You need to engage the children who have the problems you want to fix too.</p> <p>Your plans around this issue have missed out changes to roads to promote active travel both walking and cycling / scootering.</p> <p>Unhealthy takeaways should be resisted – currently your policy is failing with a KFC and Dominos coming to Whitton High Street with 2000+ school children in close proximity. This needs fixing.</p>
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
52	Winston W Taylor	Making car travel more difficult through parking restrictions. Providing facilities (in the widest sense) promoting active lifestyles easily accessed by residents, An example where this does not work - Teddington Sports Centre at Teddington School. This centre is not accessible to me and I am sure a number of Teddington residents. There is no public transport so you have to use a car and pollute the atmosphere or not use it at all.
53	Richard Woolf on behalf of McDaniel Woolf Architects	I would strongly support cycle and foot bridges to get residents connecting across the borough rather than slogging over traffic clogged road bridges.
54	Paul Luton	Low traffic neighbourhoods.
55	Jon Rowles	1) Need to make the public health director a consultee on planning applications as par the Lib Dem Manifesto.
56	Rob Kennedy, Environment Agency	The encouragement of outside gyms in public parks.
59	Paul Massey	More cycle docking/parking areas
63	Carol Rawlings	Use school buildings for community use in evenings, at weekends and during school holidays.
65	SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited	Fundamentally, delivering adequate housing with sustainable access to jobs and facilities, including open space and recreation is the key means by which planning can promote health. Ensuring a healthy mix of uses in town centres and of lower-order uses across out-of-centre geographies also promotes retail and public health.
68 (a)	Mark Jopling	Not appropriate to specify "weight loss" as a Policy goal, active lifestyle is sufficient description.
68 (b)	Mark Jopling	Weight loss is inappropriate as a Policy goal, active lifestyle is sufficient.
69	Geoff Bond on behalf of Ham and Petersham Association	Make sure it is harder to convert playing fields. Make sure people can travel to sports facilities, this will include driving to them in some instances
<b>Are there other opportunities through planning to promote healthy lifestyles?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>Public Health England has noted that "Some of the UK's most pressing health challenges - such as obesity, mental health issues, physical activity and the needs of an ageing population – can all be influenced by the quality of our built and natural environment...the considerate design of spaces and places can help to promote good health; access to goods and services; and alleviate, and in some cases even prevent, poor health and thereby have a positive impact on reducing health inequalities". Building Better Places'. Report of Session 2015-16. Written evidence (BEN0186) by Public Health England. House of Lords Select Committee on National Policy for the Built Environment</p> <p>We recommend that the council look at the Camden Planning Guidance: Planning for health and wellbeing.</p> <p><a href="https://www.camden.gov.uk/documents/20142/4833316/CPG+Planning+for+health+and+wellbeing+March+2018.pdf/f84469ed-8fdd-67fb-bfea-c948f94dfcb4">https://www.camden.gov.uk/documents/20142/4833316/CPG+Planning+for+health+and+wellbeing+March+2018.pdf/f84469ed-8fdd-67fb-bfea-c948f94dfcb4</a></p>

Respondent reference no.	Name / Organisation	Detailed comments
36	Tim Catchpole on behalf of MESS	<a href="#">See above.</a>
37	John Waxman, Crane Valley Partnership	<a href="#">See above.</a>
41	Anthony Swan	Jumping through hoops to obtain environment friendly planning permission
42	Jeremy Gill	No
44	Roger Cutler	It might be better to ensure planning doesn't produce unhealthy lifestyles. Education is most important of all . not more gyms. Stop allowing cyclists to injure people by cycling on the pavements.
45	Sally Beeson	Don't build lifts
46 (a)	Joan Gibson	The main way planning can help with health is separate walking and cycling infrastructure for all of Richmond (especially Whitton which has been completing left out of the current cycling and walking plans), and stopping unhealthy takeaways. The best way to improve exercise levels is to make it easier for Active travel to work or school. You could also work with traders to change how they layout their shops so healthy drinks and snacks are at eye level, put in footprints in train stations etc. to get people to walk upstairs, create active travel maps see <a href="https://www.newcastlecan.com/articles/metro-walking-map-the-step-by-stop-active-travel-guide">https://www.newcastlecan.com/articles/metro-walking-map-the-step-by-stop-active-travel-guide</a> , run school cookery courses to teach staff and pupils how to create healthy snacks and meals, lobby for changes to the cookery curriculum so only healthy food is cooked, write to businesses to get them to promote active travel, healthy eating by providing fruit to snack on and exercise breaks.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough. There are many traffic jams and speeding, dangerous polluting vehicles across the Borough - ban them.
52	Winston W Taylor	See previous answer. I am sure there are others but no time.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Accessible green open spaces , and not just the Royal Parks who take the brunt of the heavy lifting . Let's get our derelict common land and woodlands restored.
54	Paul Luton	See travel above.
55	Jon Rowles	- Ensure that new developments are permeable and link up - all too often roads are dead ends and or gated. This also increases the social isolation of the elderly which is also a health risk
63	Carol Rawlings	Swimming pools and the replacement of the old Richmond skating rink. The former could be provided by making school swimming pools open to the public when not in use.
65	SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited	As a precautionary measure, not allowing changes of use to food and drink uses based on lack of viability in areas of deprivation may promote a healthier mix of uses in those area.
69	Geoff Bond on behalf of Ham and Petersham Association	Do more to protect areas from development that are used for recreation. I am less likely to walk down Great South Avenue for recreational purposes since the St Michael's Convent building or Petersham Avenue since the Russell School and German school buildings
<b>How can we ensure convenient and welcoming development with no disabling barriers, providing independent access without additional undue effort, separation or special treatment?</b>		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to ensure there is a segregated pedestrian access, there is secure cycle parking in a convenient and safe location, there is proper covered bin storage (to stop fly tipping).
31	Tim Catchpole on behalf of MESS	By liaising with the disadvantaged.

Respondent reference no.	Name / Organisation	Detailed comments
42	Jeremy Gill	Some facilities for disabled people that work.
44	Roger Cutler	Use better planners. Get better value for money.
46 (a)	Joan Gibson	Separated walking and cycling routes
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
52	Winston W Taylor	Not enough time to think about this.
53	Richard Woolf on behalf of McDaniel Woolf Architects	It's all down to good patronage , design lead development and long term over short term returns. The Building Regulations offer the practical side to this , and to be honest , the fact that the borough attracts developers who usually respond with high quality proposals should be acknowledged. How the borough responds to gated communities is a concern.
58	Michael Atkins, Port of London Authority	There must be continuing reference for riverside developments to provide riparian life-saving equipment where required and necessary, as stated in existing Local Plan policy LP 18 (River Corridors). The PLA also considers that there is need for suicide prevention measures in appropriate locations (such as CCTV and signage with information to access support) to be provided as part of new development along riverside areas where appropriate.
63	Carol Rawlings	Ban pavement parking. Make Richmond town centre traffic-free. River buses.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Towards implementation, infrastructure, delivery and sites
<b>General comments relating to this topic area</b>		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	We support measures to protect the health and well-being of the community.  We urge the Council to continue its opposition to expansion of Heathrow and increased numbers of flights over the Borough and the consequential harm to people's health from noise and air pollution as well as the global issue of carbon emissions and climate change.
<b>Call for Sites – General Views (see the details of sites put forward separate in the separate Schedule of all the Call for Sites Responses)</b>		
<b>Are there are any barriers to delivery, such as infrastructure constraints?</b>		
Of respondents who answered the question: 11 said yes, said 1 no and 3 don't know [23 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The value of sites is affected by transport links. More sites would become viable for redevelopment if the frequency of services on the railway were improved. We request the council lobby for the re-phasing of the Hounslow Loop and Windsor Service to restore the former 4 trains per hour – equally spaced out – metro style service. LBRUT is a member of South London Partnership who have a number of policies that should be feeding into the Local Plan. However there website is not being updated and there is a lack of transparency over its work. The NHS South London Partnership is also reshaping the delivery of services in South London (including LBRUT) though a Sustainability and Transformation Plan and this to should feed into the local plan <a href="https://www.swlondon.nhs.uk/our-plan/our-plan-for-south-west-london/">https://www.swlondon.nhs.uk/our-plan/our-plan-for-south-west-london/</a> .However, many LBRUT residents are reliant upon services provided at West Middlesex Hospital which is covered by the North West London Partnership – and there is a possibility that we are falling between two stalls. <a href="https://www.healthiernorthwestlondon.nhs.uk/sites/nhsnwondon/files/documents/nwl_stp_submission_summary_october_2016v2.pdf">https://www.healthiernorthwestlondon.nhs.uk/sites/nhsnwondon/files/documents/nwl_stp_submission_summary_october_2016v2.pdf</a> The LBRUT will also need to keep a watching brief on the proposal for the West London Orbital Railway, could it result in less services for Whitton Station. Alternatively, is there an opportunity for it to be extended to Twickenham or Feltham, both alternatives may serve LBRUT better? This is the link to the business case <a href="http://content.tfl.gov.uk/west-london-orbital-strategic-outline-business-case.pdf">http://content.tfl.gov.uk/west-london-orbital-strategic-outline-business-case.pdf</a>

Respondent reference no.	Name / Organisation	Detailed comments
		LBRUT should consider how it can liaise better with the West London Alliance (WLA) which is a partnership body of Barnet, Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon and Hounslow. Like the NHS Partnerships there is a risk that neighbouring areas are not considering our needs fully.
31	Tim Catchpole on behalf of MESS	Delivery on the Brewery site will be constrained by gridlock on Lower Richmond Road.
41	Anthony Swan	Width of road, parking
44	Roger Cutler	Unsafe roads & pavements. The allowing of pavement cycling.
52	Winston W Taylor	I am sure there are plenty but no time to consider properly.
53	Richard Woolf on behalf of McDaniel Woolf Architects	We should consider connective links within open land and not be scared of having an adult conversations about land use.
55	Jon Rowles	The three narrow railway bridges in Whitton (Hospital Bridge Road, Nelson Road, and Hanworth Road) are a barrier to getting people walking and cycling more. They also act to separate communities and make the area too car centric.
59	Paul Massey	Tommy Steel bend
63	Carol Rawlings	Many multi-storey buildings do not have lifts, especially homes above shops.
68 (a)	Mark Jopling	The Council should be bolder in its convictions and decision making behind the Local Plan. Take a stronger line on legal matters to dissuade inappropriate development.
69	Geoff Bond on behalf of Ham and Petersham Association	Richmond Park and the River Thames means Ham and Petersham has one road through it.
<b>Other General comments</b>		
15	Transport for London	<p><i>Please note that these comments represent the views of Transport for London (TfL) officers 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. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA).</i></p> <p>Thank you for giving Transport for London (TfL) the opportunity to comment on Richmond's Local Plan Direction of Travel document. Given the advanced stage of the draft London Plan in the adoption process – with the Intend to Publish version now available on the <a href="#">GLA website</a> – we will have regard to it when assessing and responding to local planning policy consultations, including Richmond's Local Plan Direction of Travel document. We also note that the Mayor has received direction from the Secretary of State and is currently considering his response.</p> <p><b>[See Appendix for copy of TfL's response on Richmond's draft Transport SPD and a graph of Destinated-based cycle mode shares. Note the response to the Transport SPD was previously published on the Council's website <a href="https://cabnet.richmond.gov.uk/ieDecisionDetails.aspx?AllId=38737">https://cabnet.richmond.gov.uk/ieDecisionDetails.aspx?AllId=38737</a>]</b></p>
16	Avison Young on behalf of National Grid	<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p><b>About National Grid</b></p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p><b>Proposed development sites crossed or in close proximity to National Grid assets:</b></p> <p>Following a review of the above Development Plan Document, we have identified that one or more National Grid assets pass through your Local Authority area. Details of these National Grid assets are provided below.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p><b>Electricity Transmission</b></p> <p><b>Asset Description</b></p> <p><b>275Kv Underground Cable route: WIMBLEDON - WILLESDEN</b></p> <p><b>275Kv Underground Cable route: EALING - LALEHAM 1</b></p> <p>A plan showing details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only. <i>[See Appendix for plan]</i></p> <p>Please also see attached information outlining further guidance on development close to National Grid assets. <i>[See Appendix for further guidance]</i></p> <p><b>Further Advice</b></p> <p>National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.</p>
17	Hannah Bridges, Spelthorne Borough Council	<p><i>[Infrastructure]</i></p> <p>Given the scale of development planned in the area additional demand on local infrastructure and transport is expected, therefore Spelthorne would welcome further engagement regarding strategic transport and infrastructure issues, along with Surrey County Council who recently produced transport modelling for Spelthorne's Preferred Options Local Plan.</p>
6	Marine Management Organisation	<p>The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.</p> <p><b>Marine Licensing</b></p> <p>Activities taking place below the mean high water mark may require a <a href="#">marine licence</a> in accordance with the <a href="#">Marine and Coastal Access Act (MCAA) 2009</a>. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Local authorities may wish to refer to our <a href="#">marine licensing guide for local planning authorities</a> for more detailed information. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that would affect a protected marine species.</p> <p><b>Marine Planning</b></p> <p>As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas.</p> <p>Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the <a href="#">Marine Policy Statement</a> for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the <a href="#">Marine and Coastal Access Act</a> and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our <a href="#">online guidance</a> and the <a href="#">Planning Advisory Service soundness self-assessment checklist</a>. If you wish to contact your local marine planning officer you can find their details on our <a href="#">gov.uk page</a>.</p> <p>See <a href="#">this map on our website to locate</a> the 6 marine plan areas in England. For further information on how to apply the marine plans please visit our <a href="#">Explore Marine Plans</a> service.</p> <p><a href="#">The East Inshore and Offshore marine plans</a> were adopted on the 2nd April 2014, becoming a statutory consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p><a href="#">The South Inshore and Offshore marine plans</a> were adopted on the 17th July 2018, becoming a statutory consideration for public authorities with decision making functions. The South Inshore and South Offshore Marine Plans cover the coast and seas from Folkestone to the River Dart in Devon.</p> <p>The <a href="#">draft North East Inshore and Offshore marine plans</a> were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The North East Inshore and Offshore marine plans cover the coast and seas from Flamborough Head to the Scottish border. <a href="#">CONSULTATION OPEN UNTIL 6TH APRIL</a> 2020. This is the final stage of statutory public consultation before we submit the marine plan.</p> <p>The <a href="#">draft North West Inshore and Offshore marine plans</a> were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The North West Inshore and Offshore marine plans cover the coast and seas from the Solway Firth border with Scotland to the River Dee border with Wales. <a href="#">CONSULTATION OPEN UNTIL 6TH APRIL</a> 2020. This is the final stage of statutory public consultation before we submit the marine plan.</p> <p>The <a href="#">draft South East Inshore marine plan</a> was published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The South East Marine plan covers the coast and seas from Felixstowe in Suffolk to near Folkestone in Kent. <a href="#">CONSULTATION OPEN UNTIL 6TH APRIL</a> 2020. This is the final stage of statutory public consultation before we submit the marine plan.</p> <p>The <a href="#">draft South West Inshore and Offshore marine plans</a> were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The South West Inshore and Offshore marine plans cover the coast and seas from the River Severn border with Wales to the River Dart in Devon. <a href="#">CONSULTATION OPEN UNTIL 6TH APRIL</a> 2020. This is the final stage of statutory public consultation before we submit the marine plan.</p> <p><b><u>Minerals and waste plans and local aggregate assessments</u></b></p> <p>If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:</p> <ul style="list-style-type: none"> <li>• The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.</li> <li>• The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.</li> <li>• The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.</li> <li>• The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.</li> </ul> <p>The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.</p>
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	<p>The Group would once again urge the Council to prepare an updated <i>Proposals Map</i> (or <i>Policies Map</i>) to replace that adopted in July, 2015, showing amendments or additions to boundaries and site-specific Allocations adopted since then, including, we hope, adjustments to the boundaries of designated Metropolitan Open Land and Public Open Space in the Old Deer Park, potential adjustments to the boundary of the Historic Registered Park, the boundary of the area covered by the <i>Old Deer Park Supplementary Planning Document</i> and the boundary of the Old Deer Park Conservation Area, to remedy significant and long-established anomalies, as set out very clearly in the Group's submissions to the Council in response to consultation on the preparation of the <i>Richmond-upon-Thames Local Plan</i> of July, 2018 and the <i>Old Deer Park Supplementary Planning Document</i> of February, 2018, and in earlier submissions. Regrettably, the Group's formal submissions proposing and justifying these boundary adjustments were not properly or adequately considered by either the Council or the Inspector. Also attached is a copy of the letter of the 22<sup>nd</sup> January, 2018 addressed to the Council's Project Manager for the Village Planning Programme responding to the invitation to review and comment on the substantially deficient and defective <i>draft Pools-on-the-Park, Richmond Statement of Significance</i> – relating to Site-specific proposal SA 22 in the <i>Local Plan</i> - to which specific reference is made in the <i>Old Deer Park Supplementary Planning Document</i> and which remains unchanged on the Council's planning policy web-site, despite repeated requests to revise the document.</p> <p>Copies of the following items are appended to this statement:</p> <ul style="list-style-type: none"> <li>• The London Borough of Richmond-upon-Thames Local Plan, A Statement by the Old Deer Park Working Group for presentation at the relevant hearing session of the Inspector's examination, based on the Group's earlier submissions to the Council, September, 2017;</li> <li>• <i>The Old Deer Park Draft Supplementary Planning Document, December, 2017, A response by the Old Deer Park Working Group, January, 2018; and</i></li> </ul>

Respondent reference no.	Name / Organisation	Detailed comments
		<ul style="list-style-type: none"> <li>Letter to Ms Nicky Linihan (the Council's Project Manager for the Village Planning Programme) of the 22<sup>nd</sup> January, 2018 responding to the <i>Draft Pools-on-the Park, Richmond, Statement of Significance</i>.</li> </ul> <p><b>[See Appendix for Group's earlier submissions]</b></p>
(23)	Peter Willan & Vivien Harris on behalf of Friends of Richmond Green	<p>Please note the Friends of Richmond Green have indicated that they wish to support the comments made by Prospect for Richmond, Respondent No. 23. FoRG are a long established amenity group covering around 350 households around and in the vicinity of Richmond Green and Little Green (the Green). We aim to preserve the special qualities, character and setting of the historic Richmond Green. The Green is a wonderful setting with many historic views and vistas and is a major attraction for people visiting the town, its shops and offices and is much appreciated by the many residents in the vicinity of the Green as well as residents in the town's wider reaches.</p> <p>The Richmond Town response includes the Green, which FoRG is particularly interested, but we also support the concept of Richmond comprising Central Richmond, the Green and the Riverside Conservation Areas as addressed in the Richmond Town response.</p>
32	Mark Jopling on behalf of UPPFT	<p>We encourage the Council to be bold with the Local Plan, and then defend it rigorously. One of the lessons from UPPF was that a tougher stance by the Council 5 years ago could have avoided a costly and long Planning saga. The Trust would like to thank the Council for their ongoing support of upholding the current Local Plan protection bestowed on Udney Park. The Trust are dismayed that the speculative punt by Quantum has absorbed so much public and volunteer resource to defend the Local Plan and so urge the Council to use this Local Plan revision to prevent such schemes ever getting funding.</p> <p>To resolve the future of UPPF as a long term sustainable self-funded community facility the Trust urge the Council to use the Compulsory Purchase Order and Community Asset Transfer process to ensure that the current owners cannot carry out their threats to close the playing fields to try and force a submission from the community and the LPA. Such a move would send a clear signal to speculators, invest where the Richmond Local Plan directs or lose.</p>

Table of organisations registering acknowledgement of engagement and making no comment

Respondent number	Respondent name and/or organisation	Response
8	Sharon Jenkins, Natural England	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have <b>no comments</b> to make on this consultation.
11	Surrey County Council	Thank you for consulting Surrey County Council's the Minerals and Waste Planning Policy team and Spatial Planning team on the Local Plan Direction of Travel consultation and Call for sites. We do not have any specific comments to make on this consultation, but please keep us informed of any future consultations.

**Appendices:**

15. Transport for London
16. Avison Young on behalf of National Grid
23. Peter Willan & Paul Velluet on behalf of Old Deer Park Working Group
24. Paul Velluet
30. Jon Rowles on behalf of OBO Friends of Heathfield Recreation Ground and Environs