

**All responses received to the Call for Sites**

[https://www.richmond.gov.uk/services/planning/planning\\_policy/local\\_plan/new\\_local\\_plan\\_direction\\_of\\_travel\\_engagement](https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/new_local_plan_direction_of_travel_engagement)  
<https://haveyoursay.citizenspace.com/richmondecsc/call-20/>

**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
2.	CBRE on behalf of LGC Teddington
3.	Katie Parsons, Historic England
8.	Sharon Jenkins, Natural England
11.	Surrey County Council
13.	Heather Archer, Highways England
19.	DP9 Ltd on behalf of London Square Developments
21.	Lucy Wakelin, Transport for London Commercial Development
22.	Jimmy Wallace, Richmond Athletic Association
24.	Paul Velluet
26.	Hannah Lukacs
31.	Tim Catchpole on behalf of the Mortlake with East Sheen Society
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
46.	Joan Gibson
55.	Jon Rowles
72.	Andrew Weeks

Respondent reference no.	Name / Organisation
73.	Pegasus Group on behalf of Sheen Lane Developments
74.	Savills on behalf of Thames Water
75 (a) and (b)	David Taylor
76.	Henry Clive
77	Jennifer Farrell and Batu Lortkipanidze
78.	Graham Green
79.	Max Hampton
80.	Lira Cabatbat
81.	Dawn Roads
82.	Campbell Brown
83.	Chris O'Rourke
84.	Natasha Waithe
85.	Malcolm Hay
86.	Hester Huttenbach
87.	Clarissa Louise Angus
88.	Defence Infrastructure Organisation on behalf of the Ministry of Defence

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

## Detailed comments as received:

Respondent ref. no.	Name / Organisation	Detailed comments
2.	CBRE on behalf of LGC Teddington	<p>We write on behalf of our client LGC Ltd. (hereafter referred to as 'LGC') in response to consultation on the Local Plan Direction of Travel Document and Call for Sites.</p> <p>LGC is the UK National Measurement Laboratory and Designated Institute for chemical and biomeasurement. It has also been home to the UK Government Chemist function for more than 100 years. The company's headquarters is located on Queens Road in Teddington (hereafter referred to as 'the site'). A site plan is enclosed (see Appendix 1).</p> <p>On behalf of our client, we write to revive and reinforce our previous advocacy for redevelopment of the site for a mix of employment and residential uses. Over three years have now passed since our last correspondence on this matter and the importance of bringing forward enabling development on part of the site has never been more crucial.</p> <p>This consultation response follows previous representations submitted to London Borough Richmond upon Thames (LBRuT) on behalf of LGC, in respect of the now adopted Local Plan (July 2018 and March 2020). Previous representations presented to the Council on behalf of LGC were dated 15<sup>th</sup> February 2017, 18<sup>th</sup> August 2016 and 28<sup>th</sup> January 2016. These representations supported a mixed-use allocation at the site, most importantly for a modern, fit-for-purpose headquarters premises, alongside much needed housing, including affordable housing.</p> <p>Since the submission of our previous representations, LGC existing facilities in Teddington have become increasingly unsustainable, obsolete and outmoded. In part, this is due to far reaching changes to customer requirements and continuing evolution and miniaturisation of scientific techniques.</p> <p>Due to the original design and construction methods used, the building has a significantly higher operating cost than any other UK LGC site. In addition, the mechanical and electrical equipment (plant) that had already reached the end of its sustainable lifespan at the time of our previous representations, has now continued to operate for an additional three years. It is evident that the buildings are wholly unsustainable into the medium term. Further, increasingly high operating costs and inefficiencies are in large part due to the facility originally being designed and built for wet chemistry laboratory operations. Over time, substantial changes to scientific methods are evident, particularly with the introduction of instrument based analytical methods (e.g. liquid &amp; gas chromatography and mass spectrometry etc). The site in its current form is now fundamentally constraining LGC's operating model in Teddington, contrary to facilitating the delivery of the LGC's wider business objectives and crucial national and global roles in measurement science.</p> <p>The site remains an important facility to LGC with its skilled local workforce. It is LGC's intention to retain the site as its group headquarters and part of its UK laboratory operations. However, the cost of upgrading the facilities is extremely high and a large portion of the site is surplus to LGC requirements.</p>

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		<p>The adopted Local Plan clearly sets out the Council’s broad support for LGC. As stated in paragraph 10.1.4 of the adopted Local Plan – “The borough is home to nationally important scientific institutions such as... the head office of the Laboratory of the Government Chemist (LGC). Scientific, innovation and research, provision of incubator units and laboratories will be supported.”</p> <p>A land-use allocation for mixed-use enabling development would go much further than simply providing a new, high-quality, fit-for-purpose facility to sustain LGC in the borough into the long-term. The site is currently under-developed, under-used and under-occupied. The effective use of this sustainable brownfield site would be assured through the development of a significant quantum of new Grade A office space, separate to that developed for LGC’s new headquarters building. New, much needed employment floorspace would serve to provide accommodation for a range of occupiers including start-ups and expanding/relocating businesses within LBRuT. Enabling development as part of the site through the building of new homes must also form part of any mixed-use allocation. New homes would not only serve to subsidise quality new commercial development on site, but also provide an appropriate means of delivering much needed homes and affordable homes for the borough.</p> <p><b>Housing and Employment Policy:</b></p> <p>The adopted Local Plan currently protects the site for employment use through its designation as ‘Locally Important Industrial Land and Business Parks’. We respectfully urge the Council to explore with LGC how the existing net employment floorspace can be successfully re-provided on site, whilst also allowing for the delivery of a substantial number of new homes for the borough. The critical matter of housing land supply and delivery of homes is explored further below.</p> <p>Notwithstanding <b>Policy LP40 (1)</b> of the adopted Local Plan seeks the broad protection of employment land, stating “land in employment use should be retained in employment use for business, industrial or storage purposes”, the policy continues by making an allowance under exceptional circumstances for mixed-use redevelopment. <b>Policy LP40 (4)</b> states “mixed use development proposals which come forward for specific employment sites should retain, and where possible enhance, the level of existing employment floorspace”.</p> <p>The supportive context of <b>Policy LP40</b> for mixed-use redevelopment is reflected at national policy level. The National Planning Policy Framework (NPPF) actively seeks to promote effective use of land. <b>Paragraph 118</b> directs that planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed use schemes; give substantial weight to the value of using suitable brownfield land within settlements; and promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. A mixed-use allocation would truly serve to optimise the use of this highly sustainable brownfield site.</p> <p><b>Policy LP34</b> states a borough target of 3,150 homes for the period 2015-2025, equating to 315 per annum. Crucially, the Council commits to exceeding this minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies.</p> <p><b>The London Plan – Intend to Publish (ItP)</b> version (December 2019) should be offered substantial weight given it is now in the final stages of preparation, where it has not been challenged by the Secretary of State. The <b>London Plan ItP</b> version provides for an increased housing</p>

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		<p>land supply requirement for LBRuT of 4,110 over a 10-year period, or 411 units per annum. This represents an increase of 960 units over a 10-year period. At a strategic level, the London-wide <b>Strategic Housing Market Assessment (SHMA)</b> has identified a need for 66,000 additional homes across London per annum.</p> <p>Borough's should be identifying and seeking to enable additional development capacity to supplement targets, thereby realising the true potential of brownfield housing capacity. The <b>London Plan ItP</b> version makes it clear that making the best use of land means directing growth towards the most accessible and well-connected places. Intensification of existing places will be required, including in outer London. <b>Policy GG2c</b> specifically directs the proactive exploration of potential to intensify the use of land to support additional homes and workspaces. This would involve the promotion of higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.</p> <p>Crucially, the very recent (13 March 2020) written response prepared by Secretary of State for Housing, Communities and Local Government to the Mayor of London in respect of the Intention to Publish version of the London Plan, was deeply critical of the response to housing delivery and affordability. The Secretary of State was clear that the approach for the ItP version of the London Plan was "inconsistent with the predevelopment stance we should be taking" and "the necessary decisions to bring more land into the planning system had not been taken". In addition, the Secretary of State reinforced that the "plan must be brought to the minimum level [he] would expect to deliver homes to start serving Londoners in the way they deserve" specifying that site density must be optimised, and development is brought forward to maximise site capacity. Finally, Rt Hon Robert Jenrick MP, in respect of future housing delivery in London, goes on to advise the Mayor of London to make a commitment to "maximise delivery in London, including through taking proactive steps to surpass the housing requirement in [the] plan".</p> <p>At the local level, the LBRuT Local Plan <b>Housing Annual Monitoring Report 2018/19</b> (13 September 2019) serves to report on the borough's performance in respect of housing land delivery. The <b>AMR</b> states that the Borough performed well in 2018/19 overseeing the completion of 419 dwellings. However, if the average annual housing completions are taken over the 10-year period from 1<sup>st</sup> April 2009 through to 31<sup>st</sup> March 2019, it is evident that at 374 units per annum, the number would be insufficient to meet the proposed 411-unit target as stated in the <b>London Plan ItP</b> version.</p> <p>As such, a 5-year housing land supply could not be demonstrated, especially when including an additional buffer of 5% to ensure choice and competition in the market for land, as required by the <b>NPPF</b>. Taking the average annual delivery over the past 10 years and applying that across a 5-year period would equate to 1,869 dwellings, falling short of the <b>London Plan ItP</b> target of 2,055 completions across a 5-year period. When adding a 5% buffer this 5-year housing land supply target increases to 2,158 across a 5-year period.</p> <p>Notwithstanding the above, the reality of the evidence as presented in the Council's <b>AMR 2018-19</b> represents far more of a challenge. Table 4 of the 2018/19 AMR details the sources of the current 5-year housing land supply. The Council has identified a potential 1,474 units over the 5-year period, 684 units short of the London Plan ItP target plus 5% buffer.</p>

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		<p><b>Policy H1</b> of the <b>London Plan ItP</b> version clearly states that boroughs should prepare delivery focused Development Plans which allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification.</p> <p>Crucially, given the mixed-use nature of LGC's proposal, the <b>London Plan ItP</b> version continues by encouraging the intensification and effective use of land through <b>Policy E1. Policy E1(A)</b> supports improvements to the quality, flexibility and adaptability of office space through new office provision, refurbishment and mixed-use development.</p> <p>In our strong view, the site lends itself well to a mix of employment and residential uses. The site can provide for a comprehensively masterplanned sustainable mixed-use development that retains LGC in the borough, provides new employment space for new, expanding and relocating businesses and delivers much need homes. Importantly, it is clear from the recent under-delivery of affordable housing that the site could serve as a productive and effective contributor to the Council's affordable housing land supply over the forthcoming plan period. It is considered that practical aspects such as car parking and site security can be comprehensively addressed and there is no barrier to delivering a mixed-use scheme in accordance with the National Planning Policy Framework.</p> <p>A new, fit-for-purpose building that meets the current and future needs of this modern, high-technology, knowledge-based employer is vital. LGC attracts highly skilled employees in the life sciences sector. It is broadly accepted that a borough's 'stock' of high skilled workers is one of the key determinants of its economic performance. Thriving local economies require a local workforce with high levels of employability. It should be that employment and skills are drivers of local economic growth. A motivated, flexible, and skilled workforce attracts employers and boosts productivity.</p> <p>Aside from the demonstrable economic benefits there are also a broad number of social and demographic benefits. Indeed, without opportunities for skilled work, the local authority will risk an ageing workforce as young people will ultimately relocate from such an area in search of higher skilled work, training and other benefits elsewhere.</p> <p>It is evident that LGC contribute economically to LBRuT, however, it is not solely the economic value that is important, but also the global reputation of scientific excellence that it provides within the life sciences sector, which is directly associated with Teddington.</p> <p>There is a compelling case for enabling development in this instance, whereby LGC can continue to reside and operate its headquarters from the borough for many years to come, retaining highly skilled employees within a renowned and growing business of both national and global significance.</p> <p>In summary, a proportion of the site is surplus to LGC requirements, whilst the headquarters facility requires substantial modernisation including redevelopment. A sustainable mixed-use allocation including for both employment and residential use would be both suitable and appropriate enabling development, allowing LGC to have a continuing presence in Teddington for the long term. Any mixed-use development proposal for the site would actively seek to make effective use of land, re-providing net existing employment floorspace whilst providing for significant housing delivery, including much needed affordable housing.</p>

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		<p>We would be grateful if you could confirm receipt of this letter and confirm that these representations will be duly considered when assessing the strategic direction of the forthcoming local plan. Given the importance of this matter we would welcome a meeting with officers to discuss this proposal in more detail.</p> <p>The Council's support would be strongly welcomed, helping to secure LGC within the borough whilst simultaneously protecting Teddington's rich scientific heritage long into the future.</p> <p><b><i>[See Appendix for site plan]</i></b></p>
3.	Katie Parsons, Historic England	<p><u>Call for Sites</u> Historic England has no sites to put forward for consideration. We would however like to draw your attention to the need to consider the historic environment at this stage of the plan making process. Heritage assets and their setting should be included within the assessment of sites which are submitted for consideration as part of the Local Plan process and other planning policy work and, should also consider the impact of sites on heritage assets in adjoining local authority areas.</p> <p>We advocate a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. The importance and extent of below ground archaeology is often unknown, although information in the Historic Environment Record (HER) will indicate areas of known interest, or high potential where further assessment is required before decisions or allocations are made.</p> <p><u>Assessing Sites</u> Our advice note 3 on site allocations in local plans (see link below) sets out a suggested approach to assessing sites and their impact on heritage assets. It advocates a number of steps, including understanding what contribution a site, in its current form, makes to the significance of the heritage asset/s, and identifying what impact the allocation might have on significance. This could be applied to the assessment and selecting of sites within a plan.</p> <p>In assessing sites it is important to identify those sites which are appropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors. This should be more than a distance based criteria but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate.</p> <p>All potential sites will need to be appraised against potential historic environment impacts. It is imperative to have this robust evidence in place to ensure the soundness of the Plan. We recommend that the appraisal approach should avoid merely limiting assessment of impact on a heritage asset to its distance from, or inter-visibility with, a potential site. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable. Cumulative effects of site options on the historic environment should be considered too.</p>

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		<p>The following broad steps might be of assistance in terms of assessing sites:</p> <ul style="list-style-type: none"> <li>• Identify the heritage assets on or within the vicinity of the potential site allocation at an appropriate scale.</li> <li>• Assess the contribution of the site to the significance of heritage assets on or within its vicinity</li> <li>• Identify the potential impacts of development upon the significance of heritage asset</li> <li>• Consider how any harm might be removed or reduced, including reasonable alternatives sites</li> <li>• Consider how any enhancements could be achieve and maximised</li> <li>• Consider and set out the public benefits where harm cannot be removed or reduced</li> </ul> <p>If a site is allocated, we would expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting, the need for high quality design and any other factors relevant to the historic environment and the site in question. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk.</p>
8.	Sharon Jenkins, Natural England	<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated 24<sup>th</sup> February, 2020. 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.</p>
11.	Surrey County Council	<p>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.</p>
13.	Heather Archer, Highways England	<p>Your consultation is also asking for land to be identified for development. The Secretary of State for Transport does own and manage land within some areas of District Councils and a list of land available for sale is publicly available as identified below. Please therefore be advised that land that has been identified, that is already available for sale can be found on My Government Space website using the following link:  <a href="https://www.gov.uk/find-government-property">https://www.gov.uk/find-government-property</a></p>
19.	DP9 Ltd on behalf of London Square Developments	<p><b>Call for Sites – Site allocation</b></p> <p>It is put forward that the Site is allocated within the new Local Plan for residential development on the basis that this is an appropriate brownfield site for this use. The site is immediately available for development and is located within a residential area. The requirement to re-provide the employment floorspace should not be included in this instance due to the site constraints and accessibility as outlined in detail above that make the site inappropriate for continued employment useA site plan is submitted denoting the proposed site allocation and ownership in red.</p> <p><i>Continued Employment Use</i></p> <p>There are significant Site constraints associated with the Site within the residential area which make it inappropriate for continued commercial use. The Site constraints are well documented within the London Borough of Richmond Employment Sites and Premises Study (2017) which identifies that “The site is bounded by residential uses. Crane Road is primarily residential road which means that operating hours, types of industrial activity and access are constrained. The current use experiences issues with HGV access”. The Site is identified as</p>

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		<p>having poor compatibility with surrounding neighbours and poor access via residential roads with resident's parking on both sides. Furthermore, The LBRuT Employment Sites and Premises Study (2017) sets out that <i>"The departure of Greggs presents an opportunity to redevelop a large site. However, the layout and location of the site has a number of constraints including access, hours of operation and the types of industrial activity permitted limiting the amount of employment floorspace that could be delivered. Redevelopment of the site would realistically be through a mixed use scheme. The northern part of the site, fronting the River Crane, is the most suitable area for employment use."</i></p> <p>It was noted by Officers that the Peter Brett Associates Report (2017) was produced before the GLA undertook a revision of the industrial land release benchmark. As such the draft London Plan sought to retain industrial capacity within the London Borough of Richmond, however as outlined above, the SoS has found this approach unsound. The Site was therefore protected in line with the London Plan aspirations on the basis that all employment Sites should be retained disregarding the evidenced site constraints that make the Site inappropriate for continued employment use.</p> <p>As identified by LBRuT, the use of the Site by Greggs as a bakery generated a significant level of daily HGV movement on the local highway. The streets surrounding the Site are narrow residential streets and are often heavily parked on both sides. The presence of HGVs on the residential street resulted in severe highways impacts including damage to parked cars. There is also evidence of damage to footways and kerbs where HGVs have had to mount the pavement. This also presents a safety risk for other road users and pedestrians. Local complaints of noise and poor air quality as a result of the presence of HGVs accessing the Site have also been reported. Greggs Bakery benefits from an unrestricted consent, meaning deliveries and servicing to and from the Site took place throughout the day including early in the morning and late in the evening.</p> <p>As demonstrated in the Site's planning history, there have been a number of attempts to ameliorate the noise amenity impacts of the bakery operation on the neighbours over the years. Specifically, an application (ref. 08/3145/FUL) was approved in November 2008 for the installation of a noise barrier to the rear of 20-22 Crane Road. The officer report for this application identified that the benefits of the proposed barrier were not <i>"limited to the activities around the waste storage but beyond this area where there is a high degree of noise and disruption from vehicular movements from Greggs and other delivery vehicles, noise and chatter amongst workers and rivers and other such activities within the site."</i></p> <p>A prior application (ref. 85/1756) for <i>"The erection of noise baffle sidewall sheeting and roof to covered van closing area together with screen"</i> was approved on 13<sup>th</sup> February 1986. This demonstrates the longstanding incompatibility issues associated with the use of the Site as a bakery in close proximity to residential dwellings. Despite the careful management of the bakery by Greggs and the acoustic measures implemented, the uses were not considered to be neighbourly uses and contributed to the vacation of the Site by Greggs to relocate to a purpose-built facility in a more accessible and appropriate location.</p> <p>Paragraph 120 of the NPPF identifies that <i>"Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:</i></p>

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		<p><i>a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and</i></p> <p><i>b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.”</i></p> <p>In line with the requirements of the NPPF and as demonstrated, there is no reasonable prospect of the site coming forward for the use allocated in the current plan. On this basis, it is considered that a site allocation for residential-led use which meets an unmet need in the Borough should be brought forward in accordance with NPPG paragraph 120.</p> <p><i>Office Use</i></p> <p>In accordance with the adopted Local Plan Proposals Map, the site is located within the Key Office Area – West Twickenham Cluster. Adopted policy encourages new office development within designated Key Office Areas. While the Site may be appropriate for minor provision of office space as part of mixed-use development, it is our consideration that the Site should not be allocated for office-led development.</p> <p>Paragraph 86 of the NPPF directs main town centre uses, such as office use, to existing town centres. Policy E1 of the draft London Plan seeks to consolidate and extend office markets in outer London, focusing new development in town centres and existing office clusters, having regard to Table A1.1 which sets out centres with greatest potential to accommodate office development. The aforementioned table identifies the nearest town centre, Twickenham, as having potential to accommodate mixed-use office development. Representations submitted to Richmond Council from the GLA (dated 20 March 2020, ref. LDF22/LDD16/LP02/HA01) echoes this approach. This approach is important to ensure the vitality and viability of existing town centres. As the Site is not located within a town centre nor an existing cluster of office use, the Site is not appropriate for continued allocation as a Key Office Area.</p> <p>Moreover, the GLA’s representations state that Richmond should differentiate its approach towards industrial and office development. We agree with this consideration as it is evident that there is some overlap in the allocations of Locally Important Industrial Land and Key Office Locations, including the West Twickenham Cluster Key Office Area. Again, office development should be directed to town centres and existing office clusters.</p> <p>The Site is not located near any town centre nor the amenities required to support a significant commercial workforce. The 175 sqm of floorspace proposed as part of application ref. 19/0646/FUL is considered to be the maximum viable level that can be sustained in this location. A local demand report by Milestone Commercial was submitted in support of the aforementioned application which confirms that there is no demand for a significant level of office floorspace in this residential location outside of a centre and as such development of a significant level of offices in this location would come with a high risk of vacancy. It is identified that there are high vacancy rates of offices and falling rents within the surrounding area and Milestone’s opinion is that a fully commercial scheme would not be viable or sustainable due to the lack of demand.</p> <p><i>Brownfield Site</i></p>

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		<p>Paragraph 118 of the NPPF (July 2018) sets out that planning policies and decisions should “give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.” The proposals accord with these objectives whilst enhancing the character and appearance of the Site and surrounding area.</p> <p>Policy 3.3 of the London Plan identifies the potential to realise brownfield housing capacity, including for mixed use redevelopment, especially with surplus commercial capacity.</p> <p>The importance of utilising brownfield Sites is maintained in the Draft London Plan and the supporting text of draft London Plan Policy GG4, which identifies that “Reusing large brownfield sites will remain crucial, although vacant plots are now scarce, and the scale and complexity of large former industrial sites makes delivery slow.”</p> <p>Planning policies at all levels encourage the effective use of previously developed land. The proposed allocation of this brownfield Site would accord with this objective.</p> <p><i>Residential Use</i></p> <p>The Site has potential to deliver at least 116 residential dwellings over a mix of unit sizes and tenures. This provides an opportunity to contribute to strategic objectives for delivery of housing, including family housing and affordable housing.</p> <p>Redevelopment of the brownfield Site, which currently comprises outdated industrial buildings, will benefit the predominantly residential character of the area. Redevelopment will remove an unneighbourly industrial use and its associated HGV trips on residential streets. The Site also provides an opportunity to open up access to the River Crane at its northern edge.</p> <p>There is a clear justification and significant benefits to be gained in the redevelopment of the Site for residential accommodation which is appropriate within the surrounding residential context. The proposed residential use is supported in line with national objectives to increase the housing supply across the capital, the London Plan aspirations to deliver new homes across London and the Local Plan requirements to deliver a significant level of new homes specifically within West Twickenham.</p>
21.	Lucy Wakelin, Transport for London Commercial Development	<p>TfL CD owns two sites within the borough which are suitable for residential development. Optimisation of both sites through residential-led development would align with Intend to Publish London Plan Policies H1 and D3, proposal 97 of the Mayor’s Transport Strategy and paragraph 122 of the National Planning Policy Framework, which seek to ensure the efficient use of land (particularly housing delivery) through maximising development potential. As requested, we provide details of the two sites below.</p> <ul style="list-style-type: none"> <li>• Twickenham Bus Stand, Station Yard, TW1 4LG</li> </ul> <p>Twickenham Bus Stand is owned freehold by Transport for London. At present this site has ongoing operational requirements however, TfL CD recognises that Twickenham Bus Stand has the potential for future residential development should a suitable and feasible alternative site be found to accommodate the ongoing operational requirements. This is also recognised by site allocation TW 2 – Station</p>

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		<p>Yard in the Twickenham Area Action Plan (2013) which covers Twickenham Bus Stand and the adjacent, privately owned site. A planning application was recently submitted on this adjacent site and is currently pending a decision (ref: 19/3616/FUL).</p> <ul style="list-style-type: none"> <li>• Fullwell Bus Garage, TW2 5NX</li> </ul> <p>Fullwell Bus Garage is owned freehold by Transport for London. This site has the capacity for a significant mixed-use redevelopment, including re-provision of the bus garage. Redevelopment of this site has the potential to provide a substantial number of new homes and aligns with Intend to Publish London Plan Policy H1 which states that boroughs should <i>'optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans'</i>. TfL CD also has freehold ownership of the LIDL site and would look to engage with RATP and the GLA about the opportunity for a comprehensive redevelopment of the wider site. For clarity, we have provided two separate red line boundaries; one to show the TfL owned site and one to show the potential comprehensive red line, including RATP and third party ownership.</p> <p><b>[See Appendix for site plans]</b></p>
22.	Jimmy Wallace, Richmond Athletic Association	<p><b>Call for Sites Consultation</b></p> <p><b>The Site &amp; Site Allocation</b></p> <p>The Richmond Athletic Ground is the subject of a Site Allocation (SA 23) in the adopted Local Plan (July 2018). We therefore submit to the Call for Sites Consultation that a Site Allocation should be carried forward to the emerging Local Plan but that it should be amended to better reflect the redevelopment aspirations for the Athletic Ground.</p> <p>Whilst there will be future opportunities to comment on the detailed wording of the future Site Allocation as the Local Plan progresses through its various consultation stages, we set out below some of the key requirements which we believe should be included in the Site Allocation.</p> <p>The current Site Allocation text states the following:  <i>"The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional associated leisure facilities and other complementary uses could be incorporated provided they have been fully justified as being necessary to support the continued sporting uses on the site, that they demonstrate meeting identified needs, do not detract from the main use of the site as a sports ground, and have been developed to take account of the Metropolitan Open Land (MOL) and historic designations."</i></p> <p>The emerging Site Allocation text should be updated as follows:  <i>"The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional associated leisure facilities and other complementary enabling uses, including residential, could be incorporated provided they have been fully justified as being necessary to support the continued sporting uses on the site, that they demonstrate meeting identified needs, do not detract from the main use of the site as a sports ground, and have been developed to take account of the Metropolitan Open Land (MOL) and historic designations."</i></p>

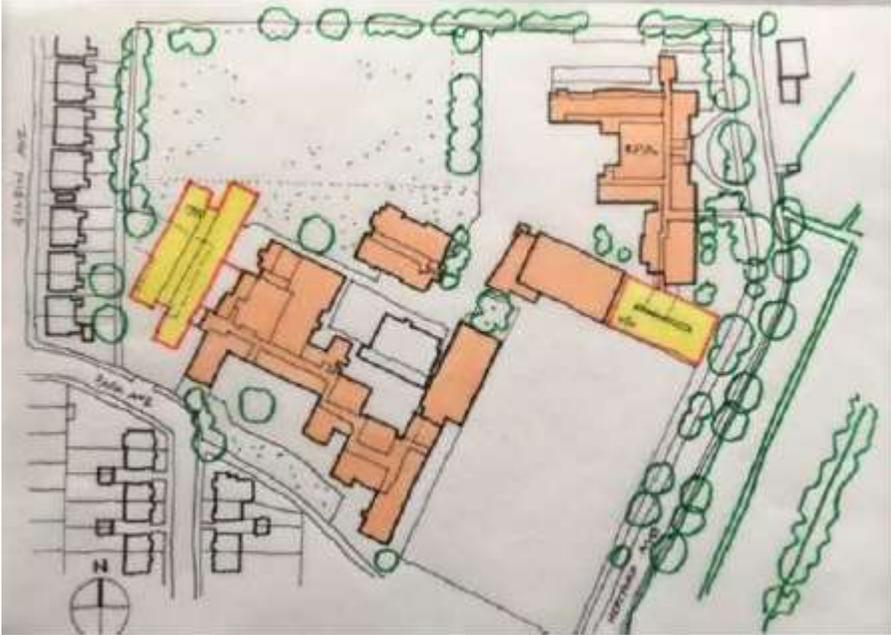
Respondent ref. no.	Name / Organisation	Detailed comments
		<p>We provide our initial justification for these proposed amendments below. Clearly, we reserve the ability to comment in much greater detail once the emerging Local Plan, including the proposed Site Allocation, is issued for formal consultation.</p>  <p style="text-align: right;"><i>Site Location Plan</i></p> <p><b>Potential Type of Development</b></p> <p>As set out in the introduction to this correspondence, the RAA is 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.</p> <p>The RAA anticipates that pre-application planning discussions with LBRuT, the Greater London Authority (GLA) and other key stakeholders will be commenced in the short term. This follows a period of ongoing project review which has sought to develop the optimum proposals for the site to guarantee the delivery of this significant project.</p>

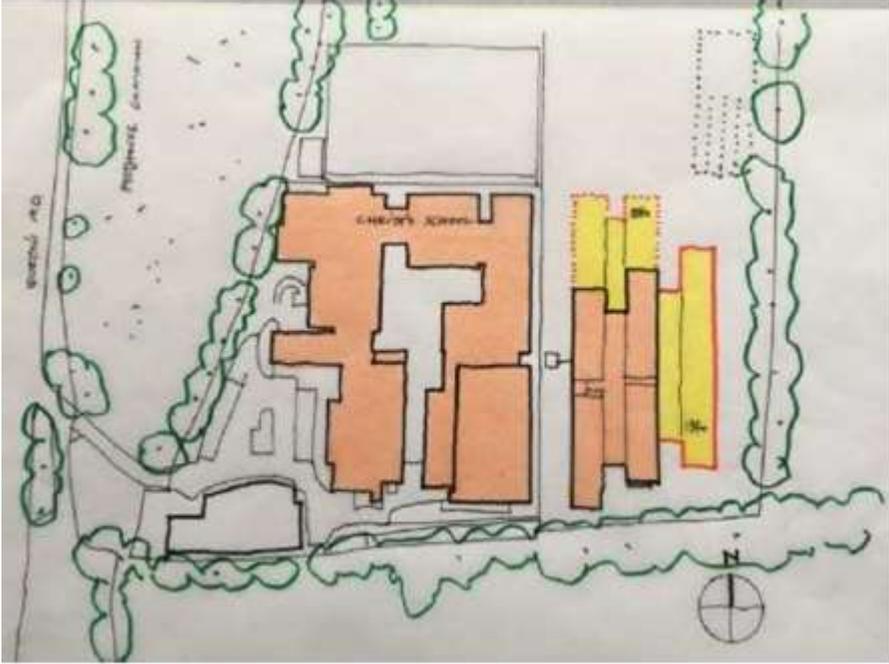
Respondent ref. no.	Name / Organisation	Detailed comments
		<p>Whilst further discussions will take place in formal pre-application meetings and wider consultation, the current preferred approach for the redevelopment of the site is broadly comprised of the demolition of a number of the existing buildings on the site and the provision of a new Grandstand with associated uses (e.g. bar, gymnasium, changing rooms, function rooms), a new Sports Hall with community access, refurbishment of the existing Grade II listed Pavilion building, a new groundsmen building together with associated ground works, enhanced playing pitches (both grass and artificial), and new floodlighting. In addition to the proposed sports uses, it is proposed that up to 100 residential units (across a range of tenures including affordable housing) will be delivered as an enabling element of the wider masterplan to cross-subsidise the delivery of the proposed new sports facilities. Whilst details including proposed drawings outlining the proposals will be provided as discussions progress, it will be clearly demonstrated how the proposed masterplan will significantly enhance the overall character and appearance of the site delivering key benefits both in terms of significantly enhanced sporting facilities but also other landscape improvements. The proposed residential component will be located on existing brownfield land within the site and will constitute a very small component of the overall site.</p> <p><b>Timescales &amp; Delivery</b></p> <p>In terms of the availability of the site for redevelopment, the RAA envisages that the pre-application planning and engagement process will commence later this year and that subject to securing the necessary planning permissions and approvals, the development could commence by late 2021 / early 2022, albeit clearly working around the constraints of the rugby calendar. Therefore, the emerging Local Plan and Site Allocation should consider the site to be deliverable in the first 5 years of the plan period.</p> <p>We are not aware at this stage of any barriers or physical constraints that would preclude the future redevelopment of the site. The site is designated as Metropolitan Open Land (MOL). The existing Pavilion building is Grade II listed and the site lies within a Grade I Historic Park and Garden and Conservation Area as well as within the Royal Botanic Gardens, Kew World Heritage Site buffer zone. These designations are all highly relevant to the acceptability to any future redevelopment of the site and would be fully assessed during both the pre-application stages and as part of any future planning application for the site.</p> <p>We trust that our initial representations will be taken into account in preparing the detailed draft of the new Local Plan. We commend the borough for commencing this early stage engagement and review of the adopted Local Plan to ensure that Local Plan policies are developed that are fit for purpose. The RAA is very keen to engage with LBRuT at the earliest opportunity and wishes to continue to be involved in further consultations on the Local Plan process moving forward.</p>
24.	Paul Velluet	<p>3.1 As noted above <b>[See respondent no.24 in the Direction of Travel Responses Schedule]</b>, I welcome the opportunity of putting forward a number of significant issues relating to the future of Richmond Station for consideration in the preparation of a new <i>Local Plan</i> given the failure of both the Council and the Inspector to properly or adequately consider and respond to such 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 Local Plan provides the opportunity to review and resolve these particular anomalies and omissions.</p> <p>3.2 As noted in the Introduction to my <i>Statement regarding Site-specific Proposal SA 19 – Richmond Station, Richmond</i> of September, 2017 (see copy attached) <b>[See Appendix]</b>, I was, and remain, seriously concerned regarding the soundness of specific aspects of the <i>Richmond-</i></p>

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		<p><i>upon-Thames Local Plan</i> relating to Richmond Station and its future – Site specific Proposal SA 19 – given that they are insufficiently robust in providing the Council as local planning authority and the local community with effective control over development affecting the particular architectural and historic interest and significance of Richmond Station as ‘a non-designated heritage asset’, and the character, appearance and significance of the Central Richmond Conservation Area as ‘a designated heritage asset’ (in the terms commended in the relevant parts of the <i>National Planning Policy Framework</i>).</p> <p>3.3 In Section 3 of my <i>Statement</i>, I set out my concerns about the soundness of specific aspects of the <i>Plan</i> relating to Site-specific Proposal SA 19 - Richmond Station, Richmond explaining the reasons for such concerns, and putting forward my suggestion on the potential means of addressing the weaknesses of the <i>Plan</i> as then submitted and securing amendment which would contribute to providing a sounder definition of the Proposal insofar as was necessary to ensure that the particular interest and significance of Richmond Station as a non-designated heritage asset and the character, appearance and significance of the Central Richmond Conservation Area as a designated heritage asset could be sustained. In setting forward these concerns, I stressed that I saw no objections to the incorporation of wording in the proposal statement referring to the provision of improved public transport interchange facilities on the site or to the potential redevelopment of the various post-war buildings to the immediate north and south of the original station-complex subject to the satisfactory scale and design.</p> <p>3.4 Regrettably, the Inspector failed to recognise or adequately recognise the significant issues about the inherent weakness Site-specific Proposal SA 19 raised in my <i>Statement</i> in his <i>Report of the Examination of the Richmond upon Thames Local Plan</i> of the 26th April, 2018 (at paragraphs 146 to 148). Accordingly, the wording of Site-specific Proposal SA 19 in the present <i>Local Plan</i> remains unduly weak and inadequate in relation to conservation issues, but importantly, potentially damaging to the survival of the existing retail role of George Street, The Quadrant, King Street and Hill Street at the heart of Richmond given the stated objective of accommodating a substantial quantum of retail floor-space on the site.</p> <p>3.5 Regrettably, despite the advice given by planning officers to the <i>Local Plan</i> hearing in September, 2017, that a revised planning brief for the Station site was being prepared to supersede that of March, 2002 and that officers were in discussion with Network Rail about the future development of the Station, and a written request to the Council’s Principal Planner in July, 2018, for an update on the position, the highly deficient <i>Richmond Station Planning Brief</i> of March, 2002 remains on the Council’s planning policy web-site and is still referred to in the present <i>Local Plan</i> – be it now referred to a ‘development brief’.</p> <p>3.6 Many aspects of the present <i>Planning Brief</i> not only pose substantial threats to the architectural and historic significance of the existing station as a locally listed complex and the Central Richmond Conservation Area through references to potential ‘comprehensive redevelopment’ and the creation of a ‘landmark building’, but importantly, but also substantial threats to the vitality and viability of the long- established retail roles of George Street, The Quadrant, King Street, Hill Street and other parts of the heart of Richmond (and its existing cinemas) by actively encouraging the establishment of a substantially scaled, mixed-use development above the tracks including retail and leisure uses.</p>

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		<p>3.7 Importantly, a particular threat posed by comprehensive redevelopment of the Station site as envisaged in both the <i>Local Plan</i> of 2018 and the <i>Planning Brief</i> of 2002 is reinforced by the site being identified as offering potential for the development of 'tall buildings' in the Council's <i>Borough-wide Sustainable Urban Development Study</i> of September, 2008 (at paragraph 4.2.2.).</p> <p>3.8 I attach a copy of my <i>Statement regarding Site-specific Proposal SA 19 – Richmond Station, Richmond, for presentation at the relevant hearing session of the Inspector's examination</i> of September, 2017. <b>[See Appendix for copy of earlier submission]</b></p>
26.	Hannah Lukacs	<p><i>[Note for context: London Square Developments sent letters to residents in the area notifying them about the Council's Call for Sites and encouraging them to provide feedback on the type of development they would like to see on the site]</i></p> <p>I was surprised by your recent letter, you quoted many figures regarding the public engagement supporting for the principle of redeveloping the site.</p> <p>Can I ask where these figures were collected from?</p> <p>I live in Crane Road and am aware that we have as a whole street presented many concerns with regards to this potential development. Whilst I understand the need for more housing in the borough, the development only appears to consider this as a factor and no other. ie school places are already at a premium, buses in the morning are packed out and many times refuse to let me on, our drains are always blocking, parking around here despite residential parking remains difficult, old peoples support and facilities are minimal. Personally I believe part of this site needs to be left as green space - not a token amount, realistic thought into the impact on local transport, school places, drainage etc etc continues to need to be considered.</p> <p>If you want family homes then this should minimally be a one side of road development to ensure parking, adequate gardens, and minimise the impact on local transport schools etc.</p> <p>Overall we continue to be anxious about any change to the site as an already packed with terraced houses cannot sustain more. I believe there are many people in Crane Road with similar concerns, we have had plans put to us with regards to housing but no options or considerations about other possible businesses, eg offices etc have been put forward, hence this appear a one horse race.</p>
31.	Tim Catchpole on behalf of the Mortlake with East Sheen Society	<p>SA24 Stag Brewery – need to review?</p> <p>SA25 Mortlake and Barnes Delivery Office – why include?</p> <p>SA27 Telephone Exchange and 172-176 URRW – comprehensive redevelopment still required</p> <p>SA28 Barnes Hospital – detailed planning still to come</p> <p>Mortlake Station – was included before and needs to be included again</p> <p>Richmond Park Academy – need to consolidate to ensure 6<sup>th</sup> form viability</p> <p>Christ's School – ditto</p>
33.	Tim Catchpole on behalf of the Mortlake Brewery Community Group	<p><b>Response from Mortlake Brewery Community Group</b></p> <p><b>SA24 Stag Brewery</b></p> <p>On 25 Jan. 2020 the Planning Committee recommended approval of (A) redevelopment for 813 housing units and various mixed uses and (B) development of a secondary school and all-weather pitch on the playing fields but refused (C) the reconfiguration of Chalkers Corner to service (A) and (B). At the time of writing there has been no news of the s106 agreement which needed to be finalized before all three applications are referred to the Mayor for decision. It remains to be seen whether the Mayor will insist on a larger affordable housing element which can only be achieved if the development were to lose some of its costly basement carpark and become more car free.</p>

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		<p>Meanwhile the ONS population projections for the Borough based partly on the 2018 birth rate data were published on 24 March 2020. This shows the 5-year olds (most being the state primary school intake population) as continuing to decline for the next 15 years while the 11 year olds (most being the secondary school intake) are shown as peaking in 2021 and then declining for the next 15 years. The picture is the same in the neighbouring boroughs of Wandsworth, Hounslow and Kingston except that the secondary school intake population peaks in 2023 before declining. This supports the finding of the Mortlake Brewery Community Group that, using the latest available data and adjusting for cohort shrinkage in the primary schools, <i>the Borough's own model</i> predicts that secondary demand in the north-east <i>including demand from children in neighbouring boroughs</i> will peak in 2021 at about 660, requiring three extra forms, and decline thereafter until at least 2025, when the demand will be about 595, requiring less than one extra form (there were no primary data to justify a prediction beyond 2025 when this finding was published). On this basis we cannot see the need for another secondary school in the east of the Borough and we urge the Council to consider once again the consolidation of the existing secondary schools in the north-east and the relocation of Thomson House School from its highly dangerous site at the Mortlake Station level crossing to the site shown in the original Planning Brief for the Brewery development.</p> <p>If the primary school is relocated then there is no need for the all-weather pitch. The playing fields should be retained, as in the original Planning Brief, with a possible upgrading of the grass turf. They are a designated OOLTI and a visual, as well as recreational, asset; they also provide a much needed soft surface serving as a soakaway in the extreme rainy conditions which are becoming more common-place in the new era of Climate Change.</p> <p>Thus, the decision on the Brewery development has not been finalized and there are still details to be submitted pursuant to planning permissions being granted. So we would like to see this site retained in the update of the Local Plan.</p> <p><b>We would like to add two more:</b>  <b>Richmond Park Academy</b>  If the final decision on the Stag Brewery Site is for a Primary rather than a Secondary School then RPA will need expansion to 8-form entry. This will enable greater viability for its 6<sup>th</sup> form. There is scope to allow further expansion without encroaching onto existing spaces which are designated OOLTI and without detriment to the Buildings of Townscape Merit on the site. The Council will need to negotiate necessary funding from the DfE. We would therefore like to see this site included in the update of the Local Plan.</p>

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		 <p><b>Mortlake Station</b></p> <p>This site, including its surrounds, featured in an earlier Local Plan but not in the current version. While we are all supportive of our local timber yards and builders’ merchants remaining in the area, these are currently sited on both sides of the station and, it has to be acknowledged, do not provide the ideal ‘gateway’ for visitors arriving at the station and heading for the prestigious Brewery development to the north and Richmond Park to the south. In addition they attract sometimes dangerous HGV movements adjacent to the level crossing and also the movement of forklift vehicles amongst pedestrians accessing the station. The current situation is already dangerous but with the additional pressure due from the STAG site development would clearly become even more unacceptable without major intervention. The Brewery development is expected to generate significantly more vehicular, and especially cycling and pedestrian traffic over the level crossing. The current footways and footbridge are completely inadequate. A detailed study is required of this whole site and the scope for development and/or enhancement and funding explored.</p> <p>We would therefore like to see this site included in the update of the Local Plan. We suggest it encompasses a small portion of Mortlake Green (as may be required to accommodate a safer crossing scheme), both the timber yards, the car showroom, the builders’ merchant and the car park sufficient to provide a high quality solution to the crossing. We are also extremely concerned about the current location of Thomson House Primary School immediately adjacent to the crossing and urge the Council and the school to consider an alternative location.</p>

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		<p><b>In addition we would like to see the following development site outside our area included:</b></p> <p><b>Christ's School</b>                      If the final decision on the Stag Brewery Site is for a Primary rather than a Secondary School then RPA will need expansion to 6-form entry. This will enable greater viability for its 6<sup>th</sup> form. There is scope to allow further expansion with only minimal encroachment onto MOL. The Council will need to negotiate necessary funding from the DfE. We would therefore like to see this site included in the update of the Local Plan.</p> 
34.	DP9 Ltd on behalf of Harlequin Football Club Limited	<p><b>1. Introduction</b>                      1.1 The recently published London Borough of Richmond Upon Thames Local Plan Direction of Travel Consultation document includes a request for landowners to identify sites in the borough that may be suitable for future development.                      1.2 The following representations identify the Harlequin Football Club site (also known as the Twickenham Stoop) and the adjacent Twickenham Central Depot site as a major mixeduse redevelopment opportunity. Harlequin Football Club has been in dialogue with the Council regarding this opportunity for a number of years.</p> <p><b>2. Site Description</b></p>

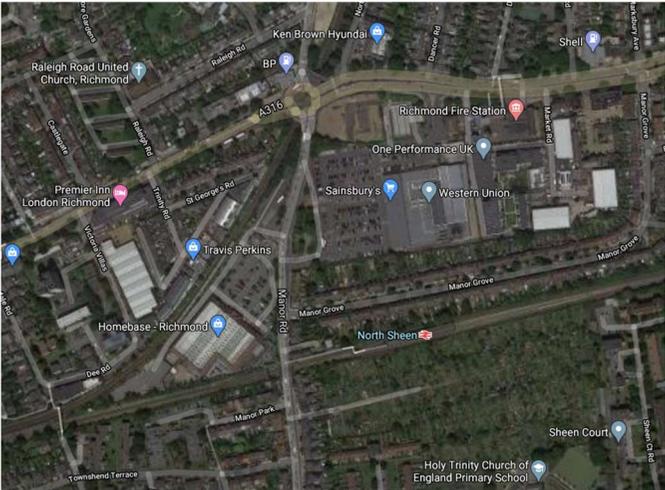
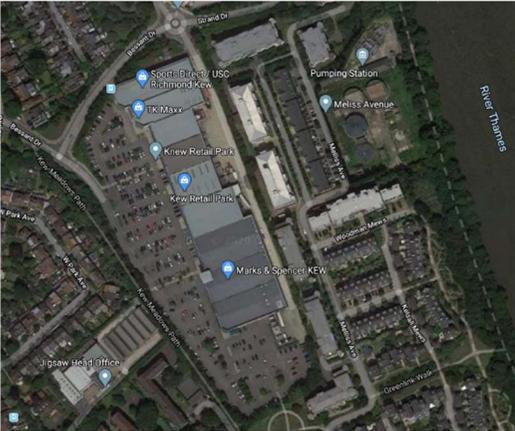
Respondent ref. no.	Name / Organisation	Detailed comments
		<p>2.1 A site location plan is included as Appendix A, and a detailed description of both sites is set out below. The combined total area of both sites is 9.7 hectares, which represents one of the largest and most important strategic redevelopment opportunities in the entire borough.</p> <p><b>Harlequin's Site</b></p> <p>2.2 Harlequin Football Club Limited, the site owner, is located on a triangular parcel of land to the south of the A316. The Site is bounded to the west by the "Duke of Northumberland River" and beyond that by the large Rosebine car park and an estate of residential properties which form part of the Rosecroft Gardens Conservation Area. Richmond Upon Thames College is located to the east of the site, itself going through a major redevelopment.</p> <p>2.3 The stadium comprises four stands, the Eastern Stand was constructed in 1996 and has a capacity for circa 4,042 spectators, with accommodation at ground and first floor level which is utilised for corporate hospitality and entertainment on match days and corporate events / meetings and private functions on non-match days. The southern end of the ground was redeveloped in 2006, with the demolition of the existing uncovered stand and the installation of a temporary Southern Stand which holds a capacity for circa 4,100 spectators, with ancillary educational facilities beneath.</p> <p>2.4 The Western end of the ground was redeveloped in 2005, with the demolition of the previous Western Stand and groundman's house and installation of a covered stand with a capacity for 3,881 spectators along with ancillary features including, players and officials facilities, club offices, club shop, a Members bar, 13 corporate hospitality boxes, an Executive club and two lounges.</p> <p>2.5 To the east of the Eastern Stand lies a triangular parcel of accessible open land, which had previously been utilised by the club for training along with hospitality events. In 2005, planning permission was granted for the development of a four-storey block of flats (67 units) on a portion of the open land as enabling works to fund the development of the Western Stand. The residential block includes both social and private housing and is known as "Challenge Court". The remaining area of open land has been retained as publicly accessible open space.</p> <p>2.6 Substantial open car parking facilities are provided on site between the stadium and the A316, providing approximately 400 on site car spaces.</p> <p>2.7 A Nuffield Health Gym is located on the eastern boundary of the Site and is within the land ownership of Harlequin Football Club.</p> <p>2.8 Vehicular access to the Site is provided via the A316, with a left turn into / out of the A316. The access road also serves the Twickenham Central Depot, with a branch route into the College Site, for use as an emergency access route by the club. The College has a right of access to use Langhorn Drive to serve its site. This junction is being significantly upgraded in the summer of 2020 to provide a traffic light left and right turn junction and new street level crossing.</p> <p>2.9 The Duke of Northumberland River forms the western boundary of the Site, with the Twickenham Central Depot and area of green open space located to the south of the Site.</p> <p><b>Twickenham Central Depot Site</b></p> <p>2.10 The Depot Site, owned by Richmond Upon Thames Council, is located immediately to the south of the Harlequin's stadium. The Site is bounded by the Richmond Upon Thames College Site to the north-east, and the Craneford Way recreation area with playing fields and children's playground to the east. The western edge of the Site lies along the path of the Duke of Northumberland River, with residential properties at Rose Croft Avenue beyond, and the main London to Reading railway line to the south.</p> <p>2.11 The West London Waste Plan (2015) identifies that the Site has been used for the following purposes:</p>

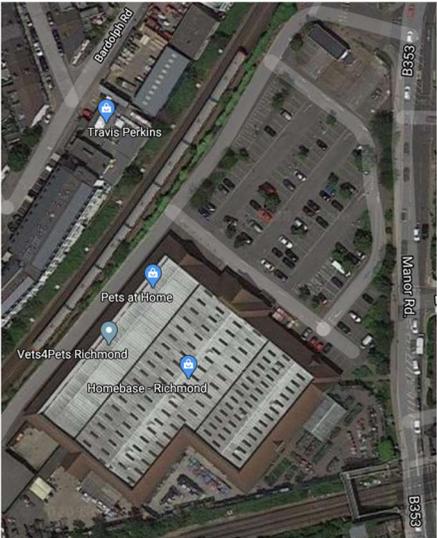
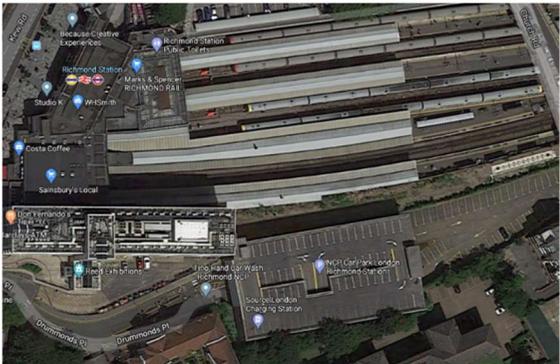
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		<ul style="list-style-type: none"> <li>• for the parking of refuse and recycling vehicles;</li> <li>• material recovery facility (MRF); and</li> <li>• bulking facilities to support municipal recycling services, for a continuous period over the last 10 years.</li> </ul> <p>2.12 There are a few structures currently onsite, including a two-storey residential property, prefabricated offices, a redundant Victorian brick building also known as the former pumphouse, bulking bays, workshops and covered vehicle storage.</p> <p><b>3. Housing Need [as under Respondent no. 34 in the Direction of Travel Responses Schedule]</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 of 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:  <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> <p><b>4. Potential Land Uses</b></p> <p>4.1 Through a well-designed Masterplan, and allowing for densities to increase on this important strategic site, we believe that it is capable of accommodating a wide range of uses, including the following:</p> <ul style="list-style-type: none"> <li>• A significant quantum of new homes, including affordable homes, with a mix of tenures and sizes</li> <li>• A new sports stadium, subject to demonstrating long term viability</li> <li>• A consolidated multi-function Council Depot</li> <li>• Workspace, conference and exhibition space, including incubator space for start-up businesses</li> <li>• Hotel</li> </ul>

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		<ul style="list-style-type: none"> <li>• Student accommodation</li> <li>• Health and Leisure facilities</li> <li>• Retail, including bars and restaurants within the stadium</li> </ul> <p><b>5. Site Opportunities</b></p> <p>5.1 Redevelopment of the site to deliver such uses offers significant opportunities at a local, regional and national level for the reasons set out below.</p> <p><b>1. Making More Efficient Use of Land</b> - The existing site as a whole and particularly the existing Twickenham Central Depot is inefficient, uses more land than it needs and requires investment. A phased mixed-use redevelopment will make more efficient use of this important site in accordance with the National Planning Policy Framework and draft London Plan.</p> <p><b>2. A Masterplan led, Mixed Use Neighbourhood</b> - A thoughtfully-designed, residential and mixed-use neighbourhood that promotes health and well-being for all, including local convenience retail.</p> <p><b>3. Contribute Significantly to Meeting Housing Need</b> – Redevelopment of the site would contribute significantly to meeting Central, Regional and Local Government housing targets. There is significant marriage value of more homes from coordinated development of the depot site and the Stoop site together. A masterplan delivering significant numbers of homes of varying size and tenure would generate a substantial New Homes Bonus to Richmond, and of course significant CIL and S106 contributions.</p> <p><b>4. New Leading-Edge Sustainable State of the Art Stadium for Harlequins</b> – A viable overall scheme incorporating a new Harlequin’s home 25,000 seat stadium and associated enabling development will generate multiple economic and social benefits for the borough, and secure the long-term future of Harlequins in this location.</p> <p><b>5. A Safe and Sustainable Community</b> - Creating a place that enables community ownership and participation; a place with identity where you know your neighbours and your neighbourhood.</p> <p><b>6. Creating a Well Connected &amp; Easy to Navigate Neighbourhood</b> - A people-focused neighbourhood which prioritises pedestrians, cyclists and public transport connections, underpinned by a simple and easy to navigate network of streets and routes.</p> <p><b>7. Designing for the Future Residents of Richmond</b> - A leading edge sustainable development, with the aspiration to deliver a highly sustainable stadium better than anything done before as well as zero carbon housing and utilising new technologies, serving as an exemplar for development projects in the borough.</p> <p><b>8. Delivering New Public Open Space</b> - A series of landscaped public spaces with their own individual character creating considerate transitions between the scale of areas around the new neighbourhood and the stadium.</p>

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		<p><b>9. Protecting and Enhancing the Existing Landscape &amp; Ecological Assets</b> - Using the site's natural assets to actively inform the design of the neighbourhood and connect to wider green and blue networks to enhance local biodiversity and public amenity.</p> <p><b>10. A Collaborative Approach to Working with Stakeholders</b> - Working with the Council together with the local resident and business community in a fully collaborative way to develop shared goals and ensure that investment benefits the local population, and specifically working with Friends of the River Crane Environment (FORCE) to genuinely improve the river corridor.</p> <p><b>11. Cross Pollination with Richmond College</b> – A redevelopment of the site would facilitate the strengthening of ties with the regenerated Richmond College and create cross-over with their education syllabus and the professional training needs at Harlequins.</p> <p><b>12. Investment in Richmond</b> - Harlequins currently makes a significant financial contribution to the Borough. Independent assessments of Gross Value Add (GVA) demonstrate the Club's contribution equates to £34 million per annum. Using the same methodology, a new stadium with associated enabling development could increase Harlequin's GVA contribution to circa £95 million per annum.</p> <p><b>6. Masterplan Concept</b></p> <p>6.1 Harlequins needs to invest in its club for many reasons including:</p> <ul style="list-style-type: none"> <li>• Customer expectations from sporting experiences;</li> <li>• The changing nature of rugby for example women's rugby;</li> <li>• Competitors improving their facilities;</li> <li>• The ability to bring the existing training facility on site;</li> <li>• To remain competitive; and crucially</li> <li>• The ability to remain financially sustainable.</li> </ul> <p>6.2 All of the above mean that doing nothing is not an option for the club. If comprehensive redevelopment is not achievable at the Stoop, Harlequins will be forced to relocate.</p> <p>6.3 Harlequin Football Club Limited has engaged the services of a full professional design team to pursue redevelopment proposals for the site, led by Populous Architects and Karakusevic Carson Architects. The images overleaf give an early visual indication as to what could be achieved on this important site.</p> <p><b>7. Next Steps</b></p> <p>7.1 Our team will continue to discuss our proposals with the Council and seek to engage with the local community. In the meantime, we trust that the Local Plan team will keep us informed as the consultation process progresses.</p> <p><i>[See Appendix for site plan and sketch views, along with site location plan]</i></p>
35.	Alice Roberts, CPRE London	<b>ANNEX 1: appropriate sites for intensification for residential, commercial or mixed-use development</b>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p><b>Fulwell</b> - Sites around the Bus garage, including supermarket car parks, could be redeveloped to meet housing demand. The site has a PTAL rating of 3. Several bus stops surround the site. Fulwell Railway Station is adjacent. The site can be developed car-free (with car club parking provision only) to maximise use of space and accommodate people who don't have access to a car (including older people, younger people and those on low incomes).</p> <p>There should be <u>no</u> development on any areas shown which are MOL or Green Belt.</p>  <p><b>North Sheen</b> - Near to North Sheen Station there are a number of large buildings and large open car parks for example, at Homebase and Sainsbury's near Manor Road. The site has a high PTAL rating of 5. The site can be redeveloped car-free to accommodate people who don't have access to a car.</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		 <p><b>Kew Retail Park</b> - This site could be re-developed to move away from car-dependent retail and /or reduce surface car parking (moving towards car club parking) to intensify the site for both residential and commercial space.</p>  <p><b>Homebase North Sheen</b> - The car park and Homebase site at North Sheen can be intensified for mixed-use development</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		 <p><b>Richmond Station</b> – car parking at Richmond Station could be replaced with commercial and/or retail development which would also serve to discourage car trips</p>  <p><b>Sainsbury's Hampton</b> This site is a concern because it ought never have been turned over to car park, being MOL as it is. In the circumstances, there could be a compromise which helps to reduce car dependency and increase housing in the borough, while returning some of the MOL back to green</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>space (along the river, to support nature and wildlife). The low rise retail unit and part of the car park could be redeveloped for a new car-free, mixed-used neighbourhood while reducing car dependency, car-trips, pollution, congestion and road danger.</p>  <p><b><u>Oldfield Road light industrial site</u></b> - This site could be intensified either for mixed use or to increase commercial space in the borough</p>  <p><b><u>Stanton Avenue</u></b> – various surface car parks – space could be used to increase commercial space in the borough</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		 <p data-bbox="568 839 2063 906"><b>Lower Teddington Road</b> - There is also some space which could be better used, currently given to what appears to be garages and surface car park, in the area to the east of Lower Teddington Road, to the south of the railway line.</p> 

Respondent ref. no.	Name / Organisation	Detailed comments
46.	Joan Gibson	<p><b>In what capacity are you responding to this consultation:</b> I live in the local area</p> <p><b>Site Location:</b> Whitton Community Centre and car park. Percy Road, Whitton. This is owned by the council and is an old inefficient (in emission terms) building. Site is large</p> <p><b>Type of Development:</b> Leisure &amp; Housing</p> <p>the Local plan wants to use sites more efficiently. You can car-lite build housing on this site with a car park in the basement for the community and medical centre (next door). The community centre can occupy the ground floor - this rebuild will make it carbon neutral. The location is excellent with good train services (buses need improving), schools, NHS services and the High Street shopping centre all in walking distance. The area can be greened as it is mostly tarmac at the moment to add to biodiversity.</p> <p><b>Potential scale of development:</b> 4 storey 32-50 flats.</p> <p><b>Site availability:</b> It belongs to you - can be available anytime</p> <p><b>Potential constraints:</b> The key community centre courses and such things as the food bank can be moved to next door Twickenham school out of school hours and Whitton youth zone during school hours.</p> <p><b>Barriers to delivery:</b> No</p> <p><b>In what capacity are you responding to this consultation:</b> I live in the local area</p> <p><b>Site Location:</b> Anywhere there is a large supermarket and car park or business park. Short list is: Sainsburys, Homebase and MacDonaldis - St Clares Rugby road business parks and Tescos. There are a lot more large supermarkets and business parks in Richmond</p> <p><b>Type of Development:</b> Retail, Leisure, Office, Warehousing &amp; Housing</p> <p>These are large sites mostly tarmac over. you can build on these sites by placing car parks underground, making sure public transport is right for car-lite developments, offices, leisure facilities and shops on the ground floor. Flats covering the site of the shop / office / warehouse and car park. Space can also be allocated to green the sites as they are currently bereft of greenery.</p> <p><b>Potential scale of development:</b> 100+ flats on each site</p> <p><b>Site availability:</b> Must ask the owners - Tesco and Sainsburys are already open to development of this sort - gives them more customers on site. Other businesses will be open to having more customers and employees on their doorstep and modern efficient premises.</p> <p><b>Potential Constraints:</b> The business will need to keep going whilst development happens. This however is achieved all the time in other developments.</p> <p><b>Barriers to delivery:</b> Yes. I assume you will have to upgrade sewers, water etc.</p> <p><b>In what capacity are you responding to this consultation:</b> I live in the local area</p> <p><b>Site Location:</b> Old Deer Car Park Richmond (and many other council car parks)</p> <p><b>Type of Development:</b> Office &amp; Housing</p> <p>You can build car-lite developments over your car parks. The car park can be moved underground with office / cultural space on the ground floor. Old Deer Park is perfect location with good transport links etc. The car park is also large so you can green parts of what is a large tarmac space.</p> <p><b>Potential scale of development:</b> Very large - multiple 100s of flats in a popular location</p> <p><b>Site availability:</b> You own it so it can be available now</p> <p><b>Potential Constraints:</b> Needs to be very much car-lite</p>

Respondent ref. no.	Name / Organisation	Detailed comments
55.	Jon Rowles	<p><b>Barriers to delivery:</b> Yes. Large site sewers etc.</p> <p><b>In what capacity are you responding to this consultation:</b> I live in the local area</p> <p><b>Site Location:</b> Bridge Farm Nursery, Hospital Bridge Road, Twickenham, TW2 6LH</p> <p><b>Type of Development:</b> Other &amp; Housing</p> <p>This site could be used as either: a) A site to relocate Bishop Perrin School. Currently, it is a small school with only one form of entry. Relocating the school across the road would allow it to be enlarged and help meet the need of extra school places – without further enlarging the alternative schools in the area which are already on the large size. (b) It could be used as a site for an alms-house so there is affordable housing for old people in perpetuity</p> <p><b>Potential scale of development:</b> The site will in the shadow of a huge standard schools block – though a primary school are typically single-story and thus would not be intrusive. The site currently has a mixture of warehouses, sheds and greenhouses so the developed footprint could be less than there is currently.</p> <p><b>Site availability:</b> The site was reserved burial land for Hounslow Council, but since the majority of the reserved land has been leased to the ESFA for the building of Turing House School – the area occupied by Kingston Landscape Group has become detached from Borough Cemetary. Hounslow Councils new cemetery strategy shows they have removed this site from their list of reserved sites which indicates they may dispose of it.</p> <p><b>Potential Constraints:</b> It will be next to a large secondary school with shared access – so there will be safety concerns.</p> <p><b>Barriers to delivery:</b> Yes. Site access.</p> <p><b>[See Appendix for site map]</b></p>
72.	Andrew Weeks	<p><u>Windfall development land in Hampton</u></p> <p>I am a long-standing resident of Hampton at <b>[full address details removed for data protection]</b> and my work takes me all over Richmond Borough. You have made a ‘call for sites’ that local residents consider suitable for development, particularly for new homes in the light of Richmond’s Housing crisis. I would recommend that consideration should be given as a ‘windfall site’ for new housing on a small pocket of wasteland on Lower Hampton Road, Hampton, immediately west of Thames Water’s Sunnyside reservoir:-:</p> <p>1/ The land lies south of the road, between Sunnyside reservoir and the access road to Armadale villa, Birkholme villa &amp; Garden Cottage. It is surrounded by Garden Cottage to the South and two new- build houses immediately to the west. Essentially it is part of Lower Sunbury riverside settlement, rather than Hampton.</p> <p>2/ Previously it was part of Thames Water’s operational land. It was sold-off around 10 years ago into private ownership and has been apparently virtually unused since, apart from occasional materials storage in some old sheds and shipping container, and on the concrete hard standing. The open land is treeless with just rough grass and brambles. It has no public access.</p> <p>3/ There is existing drop-kerb access from Lower Hampton Road – still in occasional use by Thames Water’s lorries to their reservoir for maintenance.</p> <p>4/ To my knowledge it has never been subject to flooding and @ 500 metres from a bus stop on the frequent 216 Kingston to Staines route.</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>5/ In early 2017 (I think February) your officers ran a Public consultation at Tangle Park, Hampton on the proposed Hampton SPD future plan where this pocket of land was neither shown as being in a Conservation Area nor designated as Green Belt on the detailed consultation map. If I recall correctly, the Green Belt boundary appeared to follow the reservoir embankments clearly <u>excluding</u> this pocket of waste land. That same map was adopted as policy by Richmond Cabinet in June 2017 and is now consolidated in Richmond's final, current 2018 Local Plan.</p> <p>6/ It is a notable recent precedent that two substantial houses are approaching completion on an almost identically-sized plot of previously neglected land immediately to the west of this 'windfall' site – photo attached. If this adjacent land was considered suitable for residential development, surely this v similar small infill site should be equally suitable? At least one, potentially two new substantial homes in Hampton; replacement of a long-standing derelict eyesore by (hopefully) some new-housing that reflects the style of the neighbouring Armadale and Birkdale Villas; a small but worthwhile to Richmond's sustainable housing. I commend this windfall site to your review. <b><i>[Note no photo attached to the response, however sufficient details of the site have been provided]</i></b></p>
73.	Pegasus Group on behalf of Sheen Lane Developments	<p>On behalf of Sheen Lane Developments we wish to submit representations to the London Borough of Richmond upon Thames "Call for Sites", in respect of the car park formerly associated with the St Margaret's Business Centre, Moor Mead Road, Twickenham, TW1 1JS. Sheen Lane Developments are a residential developer in agreement to purchase the site from the freehold owners of the Business Centre, PPF Real Estate Nominee 2 Limited. For the reasons detailed within this submission, we consider the site is suitable, available and deliverable for residential purposes.</p> <p><b>The Site</b> As shown on the accompanying Site Location Plan (Dwg No. L192301-D09-001), the site being submitted as part of this "call for sites" comprises land formerly used as surface car parking associated with the St Margaret's Business Centre, which adjoins the site to the south-west. The car park is surplus to the requirements, and soon to form separate ownership from, the St Margaret's Business Centre, which comprises of 7no. industrial units served by adequate parking within forecourts directly to the front of the units.</p> <p>The site is largely square and measures approximately 0.06 hectares in size. The site is bound to the north by Godstone Road and Winchester Road to the east, which are characterised by 2-storey terraced and semi-detached residential properties. The site is located within a sustainable location being 250m to the west of St Margaret's Railway Station and the adjoining shops and services.</p> <p>The adopted Local Plan allocates the St Margaret's Business Centre as a "Locally Important Industrial Land and Business Park", however the site falls outside of this designation being physically separated from it. Accordingly, the site is not currently designated for development being "white land". Since the grant of planning permission in 1982 for the Business Park (Ref. 82/0457), the site has always been used intermittently for overflow car parking and has never assumed an employment use.</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>The site does not lie within a Conservation Area and none of the buildings within immediate vicinity are statutory Listed. According to the Environment Agency indicative flood maps, the site is wholly located within Flood Zone 2, which has a medium probability of flooding (between a 1 in 100 and 1 in 1,000 annual probability of river flooding). Whilst the site is predominately hard standing, there is vegetation on the site's perimeter, with the mature trees protected by a group Tree Preservation Order, made on 17<sup>th</sup> October 2019 (Ref. T1049 A1).</p> <p><b>Assessment</b></p> <p>The aforementioned site represents a brownfield site which, in our view, is suitable for residential development and should be considered as part of this "call for sites" process.</p> <ul style="list-style-type: none"> <li>• The site measures 0.06 hectares in size and is capable of supporting 4-8 dwellings (66-133dph), depending on whether townhouse or flatted configuration. The site has been subject of pre-application discussions with LB Richmond upon Thames, where initial design options were considered (Annexed to this submission);</li> <li>• The site is <b>'suitable'</b> for residential development, with the existing car park use being surplus to the requirements of the adjoining Business Park. The site is not in employment use and the residential development of the site would make efficient use of this underutilised site;</li> <li>• The site is <b>'available'</b> for development being in single ownership (PPF Real Estate Nominee 2 Limited) which is under purchase agreement by Sheen Lane Developments; and</li> <li>• The site is <b>'deliverable'</b>. Subject to the grant of planning permission, the site can be delivered in the short-term.</li> </ul> <p>The main constraint from a planning perspective is the site's location within Flood Zone 2, however the nearby River Crane benefits from flood defences at the closest point to the site. The site also benefits from mature trees which are subject to a recent Tree Preservation Order. Appropriate layout design will seek to retain those trees of arboricultural value where possible, with any replacement planting forming part of a comprehensive landscaping solution for the site.</p> <p>Based upon the site's credentials described within this letter, it is our view that the site would benefit from designation for residential purposes as part of the emerging Local Plan. The site can make a valuable contribution towards the delivery of housing in the Borough, as is currently under-used and serves no meaningful purpose for either car parking or employment use. The site is previously developed land located in a sustainable residential area.</p> <p>Should you require any further information then please do not hesitate to contact me, otherwise I trust the above site will be considered as part of the "call for sites" process.</p> <p><b><i>[See Appendix for 'Design Constraints and Opportunities', 'Townhouse Sketch Proposals (4 units)', 'Flatted Sketch Proposals (8 units) and site location plan]</i></b></p>
74.	Savills on behalf of Thames Water	<p>Thames Water consider that the following sites are suitable for residential or mixed-use development:</p> <p><b>1. Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road:</b></p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>Site area: approximately 3.58 hectares (refer to enclosed location plan).            Current use: vacant.            Proposed use: residential or mixed use development.            Likely availability: 1-5 years.</p> <p>The site is currently within the Green Belt, but is very well contained and sandwiched inbetween the Stain Hill West Reservoir to the east and residential development along Kenton Avenue with Upper Sunbury Road forming the northern boundary and Lower Hampton Road forming the southern boundary. The site does not perform strongly in Green Belt terms and should therefore be assessed and removed from the Green Belt under the forthcoming Green Belt Review.</p> <p><b>2. Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road:</b></p> <p>Site area: approximately 21.18 hectares (refer to enclosed location plan).            Current use: mixed use.            Proposed use: residential or mixed use development.            Likely availability: 1-5 years.</p> <p>This site is currently within the Green Belt, but is also well contained and sandwiched between development along Oldfield Road and Kempton Racecourse with Upper Sunbury Road forming the southern boundary and the railway line to the north. The site does not perform strongly in Green Belt terms and should therefore be assessed and removed from the Green Belt under the forthcoming Green Belt Review.</p> <p>The above sites are currently retained operational land but are included in a review that Thames Water is carrying out of its landholdings to establish whether the site can be released for redevelopment. There may also be other landholdings within the locality that may be suitable for development and Thames Water would be pleased to discuss the potential for making these sites available further with the Borough.</p> <p><i>[See Appendix for site plans]</i></p>
75 (a)	David Taylor	<p><b><u>LB Richmond Call for Sites. March 2020: LAND at HAMPTON</u></b></p> <p><b>1. Respondent's role</b>            I live in the local area and own a developable site in Hampton</p> <p><b>Name &amp; address</b>            David Harvey Taylor  <i>[full Teddington address details removed for data protection]</i></p> <p><b>2. Site location</b></p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<ul style="list-style-type: none"> <li>- A pocket of land on Lower Hampton Road lying between two new-build houses to the West, Garden Cottage to the South and the operational Sunnyside reservoir to the East. Post code TW16 5PR.</li> <li>- Copy of Land Registry title map No TGL394983 attached. <b>[See Appendix for site plan]</b></li> </ul> <p><b>3. Suggested development</b></p> <ul style="list-style-type: none"> <li>- Residential Housing</li> <li>- The land was formerly owned by Thames Water for industrial material storage. The land was sold into private ownership in 2014 with the existing sheds &amp; shipping container continuing to be used for materials storage; after brief use to graze goats, the residual open land has been derelict since 2015.</li> <li>- It is a sustainable location, above the flood plain that Environment Agency confirm only has a likelihood of flooding of 1:1000 years. There is a bus-stop on the high-frequency Staines – Kingston 216 bus route about 500m away. There are no trees on the land and v limited bio-diversity (probably due to activity of previous owner’s goats!). Mains water and power is available on-site but there is no local mains drainage: the site is large enough to contain a foul water drainage field (as neighbouring properties have).</li> </ul> <p><b>4. Potential scale</b></p> <ul style="list-style-type: none"> <li>- The 0.13 hectare site is slightly larger than the immediately adjacent site to the West (in Spelthorne BC) on which 2x new-build 4-bed houses are nearing completion.</li> <li>- The neighbouring, detached Victorian Villas to the South (Armadale) and West (Birkholme) are substantial, imposing 3-storey properties.</li> <li>- There is existing dropped-kerb access into Lower Hampton Road</li> <li>- Comparatively large gardens are needed for a private foul-water drainage field system.</li> </ul> <p><b>5. Availability</b> Currently available</p> <p><b>6. Potential constraints on development</b></p> <ul style="list-style-type: none"> <li>- LB Richmond continues to claim that the pocket of land is Green Belt, but it does NOT meet the criteria for such designation and was never so-designated whilst administered by Spelthorne BC until 1995. Under Spelthorne’s custody the local GB boundary followed the ‘permanent’ Reservoir embankments, in line with PPG3 guidelines – as shown on attached plan.</li> <li>- Richmond’s 1996 UDP (1<sup>st</sup> after inheriting custody of the site) EXCLUDES the land from its GB Policy statement ENV4 and from two supporting, defining maps Nos 3 &amp; 4 illustrating the limited expansion of GB designation over other parts of nearby Hampton land concurrently inherited administratively from Spelthorne. The same UDP contains a ‘proposals’ map, without any justifying commentary, that shows Richmond’s GB boundary now following the Borough’s new Administrative boundary, rather than the reservoir embankments, and colours the site as GB – again see attached plan.</li> </ul>

Respondent ref. no.	Name / Organisation	Detailed comments
		<ul style="list-style-type: none"> <li>- LB Richmond have no evidence of implementing the necessary due process required of public consultation, proposal and policy approval to amend the GB boundary to have included my land – now simply saying <i>‘it was owned by Thames Water’</i> : ownership has never been a valid PPG3 yardstick for GB designation.</li> <li>- The 2005 LP simply duplicates the erroneous 1996 UDP summary map and states, correctly, that there was no change to Borough’s GB boundaries at that time.</li> <li>- In February &amp; March 2017 Richmond held local public consultation meetings on the Hampton SPD village future plan with a Green Infrastructure map that showed my land EXCLUDED from GB designation. That map was adopted unchanged by Richmond Cabinet on 13.June 2017 and then consolidated into the current 2018 Richmond LP.</li> <li>- Also in 2017, LBRUT’s current Cabinet Member for Environment &amp; Planning, after personally reviewing the land’s chronology, recommended that Officers <i>‘should give serious consideration to conceding that the site is not legally designated as GB’</i>. No action taken by Council officers.</li> <li>- Concluding the EiP of Richmond’s 2018 LP, and despite being INSTRUCTED by Council not to review the Borough’s GB, the SoS Inspector’s Report published on 26.4.2018 (now an integral part of the current 2018 LP) contains the following statement <i>‘it is for the Council to satisfy itself that the established GB boundary is accurately identified on policies map ..... should the Council identify that the previous depiction is inaccurate, it has the ability to correct it AS A MATTER OF FACT’</i>. He added a codicil confirming that his comment specifically referred to what is my pocket of land.</li> <li>- Previously at the meeting on 13.12.2016 under item 450, resolution 4b LBRUT Cabinet had agreed that <i>‘authority be delegated to the Planning Policy and Design Team Manager to agree .....minor amendments to the final version of the (2018) Plan as are necessary to make it sound following the public consultation period’</i>. No such corrections were made in response to the Plan’s EiP Inspector’s concerns identified in his Report about Richmond’s claimed GB designation of my land.</li> <li>- The 2020 London Plan observes in Paragraph 455 that <i>‘some brownfield (GB) land ..... is derelict and unsightly and does not provide significant benefits. In any event it is implausible to insist that the GB is entirely sacrosanct’</i>.</li> <li>- The ‘Green Infrastructure and protecting of our Open land’ section of Richmond’s ‘Direction of Travel’ document states <i>‘There could however be a small number of sites or pockets of land that could benefit from a thorough assessment against the relevant policy criteria for (GB) designation. In the event that a very small number of sites no longer meet the criteria for Green Belt .... They could be considered for providing land to address our unmet needs for ..... Housing.’</i></li> </ul> <p><b>7. Infrastructure constraints</b></p> <ul style="list-style-type: none"> <li>- None</li> </ul>
75 (b)	David Taylor (online response)	<p><b>In what capacity are you responding to this consultation:</b> I live in the local area and owns potentially develop-able land in the Borough</p> <p><b>Site Location:</b> Land adjacent to West of Sunnyside Reservoir, Lower Hampton Road, Hampton. Registered at Land Registry title number TGL394983- copy attached. <b>[See Appendix for site plan]</b></p> <p><b>Type of Development:</b> Housing</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>- The brownfield site immediately abuts the location of a pair of new-build houses currently approaching completion on an almost identical, but slightly smaller plot of land to the West. Spelthorne BC approved construction of these new-builds under delegated planning approval Ref:18/00659/FUL</p> <p>- Formerly owned by Thames Water for industrial storage, the site has been derelict for over 5 years: there are 3 derelict sheds and hard standing on the land.</p> <p>- There are no trees and minimal bio-diversity on the site; land was used by a previous owner as goat pasture.</p> <p><b>Potential scale of development:</b> Potentially a similar scale development to the two 4-bed houses nearing completion on the immediately adjacent site.</p> <p>- one of the houses would be constructed as a self-build.</p> <p>- the site already has existing drop-kerb access onto Lower Hampton Road.</p> <p>- the site is less than 600m from a bus stop on the high-frequency 216 Staines – Kingston route.</p> <p><b>Site availability:</b> Currently available</p> <p><b>Potential Constraints:</b> The site does not meet the Green Belt criteria required under NPPF and was never so designated whilst administered by Spelthorne BC until 1995.- LB Richmond 1996 UDP EXCLUDES the site from it's GB Policy statement ENV4 &amp; two defining maps Nos 3&amp;4 expanding GB designation over parts of the land transferred from Spelthorne. The same UDP contains a 'proposals' map, without any commentary, that erroneously colours the site as GB.- the 2005 LP simply duplicates the erroneous 1996 map and states there will be no change to the Borough's existing GB designations.- in 2017 LBRUT's Cabinet Member for Environment &amp; Planning, after reviewing the land's chronology, recommended that Officers should 'give serious consideration' to conceding that the site is not legally designated as GB.- despite the SoS Inspector being INSTRUCTED by LBRUT Officers not to Review Richmond's existing GB boundaries, his EiP Report (now an integral part of the final approved 2018 LP) contains the following statement ' it is for the Council to satisfy itself that the established GB boundary is accurately identified on policies map..... should the Council identify the the previous depiction is inaccurate, it has the ability to correct it AS A MATTER OF FACT'. He added in the LP that this comment specifically referred to this particular piece of land adjacent to Sunnyside Reservoir. LBRUT made no correction to their draft plan.- Para 70 of the Inspector's EiP Report in current 2018 LP also states, concerning Hampton Treatment Works, that 'application of (latest) national policy will enable due consideration to be given to development proposals on ANY site and their justification'.</p> <p><b>Barriers to delivery:</b> No</p>
76.	Henry Clive	<p>I'd like to register my objection to the development of the old Greggs factory into residential units. I would strongly prefer an amazing community space such as a wildlife park/green space, and my second choice would be development into an underground station for an extension to the District Line. If neither of these are achievable, and if a residential development has to go ahead, then it must not be allowed to go ahead as per London Square's current planning, which I have already objected to during the previous consultation.</p>
77.	Jennifer Farrell	<p>I'm writing regarding the Local Plan Call For Sites 2020 Consultation, in particular regarding the former Greggs Bakery site in West Twickenham.</p> <p>I am a local resident.</p> <p>London Square will be submitting an application for residential development on this site and I would like my objection to this noted.</p>

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		<p>Previously I was open to the idea of residential development but having seen the density of their many proposals, even after they scaled them down, I am fully against this and would prefer the site to stay as industrial.</p> <p>I bought my home here 16 years ago and more and more pressure has been put on over the years. New apartment blocks have been built, a school has been added and this small network of roads can't take much more congestion, especially not a dense new development of multiple homes. It's unrealistic and unfair to keep adding more and more people per square metre to this small area.</p> <p>I ask you to please take the many existing residents into consideration.</p>
78.	Graham Green	<p><b>In what capacity are you responding to this consultation:</b> I live in the local area and work/study in the local area  <b>Site Location:</b> Greggs Bakery, Gould Road, Twickenham  <b>Type of Development:</b> Office &amp; other  Application 19/0646/FUL seeks a fully residential redevelopment of this former employment site. The developer maintains that poor access and other constraints make the site unsuitable for continued commercial use. I do not agree. The site remains suitable for employment uses such as office, light industry, studio/workshop or similar non-polluting uses which can be carried out adjacent to residential property without seriously harming residential amenity.</p>
79.	Max Hampton	<p><b>Site Location</b>  Land to the Rear of 271 Hanworth Road, Hampton, TW12 3ER.</p> <p>271 Hanworth Road's very long rear garden provides the potential to accommodate development. Similar properties along Hanworth Road have had infill developments built, as can be seen in the attached aerial image. This site particularly lends itself to development, as it runs alongside a private road. This road forms part of the adjoining site, Glenmill, which is a block of flats owned by Richmond Housing Partnership (RHP) housing association. The land to the rear of the adjoining property, 273 Hanworth Road, also has the potential to be incorporated into the development, which would maximise the potential of the site.</p> <p>The site is well located, with local shops (a parade of shops next to Hampton High and a Sainsbury's), primary school (Buckingham Primary School), secondary schools (Hampton High, Hampton School and Lady Eleanor Holles) and a park (Hampton Common) all within a short walking distance. The site is also close to the larger Sainsbury's on Hampton Road and is well served by public transport, with Hanworth Road being a main bus route.</p> <p><b>Type of Development</b>  The land is suitable for residential development, with the potential to accommodate different tenures, types and needs.</p> <p><b>Scale of Development</b>  On its own, the site has the potential to accommodate a single new dwelling. There is the potential for a more substantial development, if the land to the rear of 273 Hanworth Road is incorporated and the development is integrated with the adjoining Glenmill site. This would provide the opportunity to create a mews, with a terrace of two or three storey houses or flats. The new dwellings would sit on the land to the rear of no. 271 and their gardens would be on the land to the rear of no. 273. Incorporating the development with the Glenmill site</p>

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		<p>would provide the opportunity to turn the access road into a mews, with the new dwellings facing Glenmill. From an urban design perspective, the development would define the new street and provide a greater sense of enclosure. The development would also provide the opportunity to make improvements to the surrounding area, such as new street trees and cycle parking. Attached is an example of how such a development could accommodate six houses (two storey/three bedrooms/approx. 95sqm), although there is the potential for the buildings to be three storeys and to accommodate flats.</p> <p>Creating a mews, with buildings facing Glenmill, would integrate the development and positively contribute to the wider area, as well as minimise the loss of green space. The development could also include measures to improve biodiversity and mitigate flood risk &amp; climate change. For example, by including the planting of new trees and designing the houses/flats to have a green roof.</p> <p>It is also considered that the wider Glenmill site has the potential for further development. The garages and area at the back of the site could be replaced with another terrace of properties that, in combination, would create a good number of new homes.</p> <p><b>Site Availability</b> As owners of the land to the rear of 271 Hanworth Road, we are happy to make the site available for development immediately. The owner of the adjoining property, 273 Hanworth Road, is also interested in seeing the sites developed together and has submitted a separate consultation response.</p> <p><b>Constraints to Development</b> The full development potential of the site would require the involvement of multiple land owners. I have had very positive discussions with the owner of 273 Hanworth Road, but what would help bring the site forward for development is greater certainty about gaining planning permission. I am a town planner and believe that the site has the potential to be developed and that the proposal, as described above, would create a high quality development that would provide new housing and positively contribute to the wider area. It would be extremely helpful if the Local Plan could allocate the site for development and/or have a positive policy that is supportive of this type of development.</p> <p><b>[See Appendix for site location plan, aerial photograph and a sketch]</b></p>
80.	Lira Cabatbat	<p><b>In what capacity are you responding to this consultation:</b> I live in the local area  <b>Site Location:</b> Land at the back of 102 Sheen Road and adjacent to 2 Sheen Park, Richmond  <b>Type of Development:</b> Housing  The area / land is presently unused. It has not been used as a garden or green space for as long as records show. The land is located between 102 Sheen Road (rear) and 2 Sheen Park Richmond.  <b>Potential scale of development:</b> A detached family house constructed to be very similar to 2 Sheen Park, a red brick Victorian property.  <b>Site availability:</b> Available now subject to planning permission  <b>Potential Constraints:</b> Richmond council has previously raised concerns at pre-application process.  <b>Barriers to delivery:</b> No. It is submitted that any concerns / constraints raised are unwarranted.</p>

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81.	Dawn Roads	<p><b>In what capacity are you responding to this consultation:</b> Company Director of company which owns land/site in the London Borough of Richmond upon Thames</p> <p><b>Site Location:</b> Arlington Works 21-27, Arlington Road, Twickenham, Middlesex TW1 2BB</p> <p><b>Type of Development:</b> Other</p> <p>Mixed use - residential and commercial/industrial/office</p> <p><b>Potential scale of development:</b> 24 residential unit minimum of 5 commercial/industrial/office</p> <p><b>Site availability:</b> 3 months</p> <p><b>Potential Constraints:</b> Planning is currently going to appeal as refused by Richmond Council in September 2019</p> <p><b>Barriers to delivery:</b> No</p>
82.	Campbell Brown	<p><b>In what capacity are you responding to this consultation:</b> I live in the local area</p> <p><b>Site Location:</b> An approximately 47m x 20m L-shape made up of two (two adjoining garden lands) alongside Glenmill roadway, off Hanworth Rd., Hampton, TW12 3EF. It is brownfield land currently forming the extended rear gardens of No's 271/273 Hanworth Rd. There are no significant trees or existing buildings on the land. RHP's 3-storey block of flats are on the Eastern side of Glenmill roadway; the 3-storey Victorian villas No's 271/273 lie to the North of the land. A comparatively recent single storey house abuts the land to the West.</p> <p><b>Type of Development:</b> Housing</p> <p>Residential housing. Attached sketch shows the potential site in RED. The GREEN overlay illustrates a possible location for 3 two-storey houses, with required on-site parking at A,B,C.The logical pedestrian &amp; vehicular access would be via RHP's existing roadway - this favoured access shown in YELLOW.This is a potentially fully sustainable site with suitable amenity space, no on-site trees, no risk of overlooking of existing properties, possible on-site parking for each house (marked A/B/C. Hanworth Rd had an existing 24hours 111 bus route Kingston/Heathrow plus frequent R70 route to Richmond.One of the 3 possible houses could be provided under 'Shared-Ownership' rules.</p> <p><b>Potential scale of development:</b> A possible terrace of 3 / 6m 2/3 bedroom houses.</p> <p><b>Site availability:</b> As part owner the combined garden land could possibly be available in the near future.</p> <p><b>Potential Constraints:</b> Development of the land would require successful negotiation of a Wayleave access agreement with RHP, as shown, for vehicles and pedestrians. RHP have confirmed that granting such an agreement would not conflict or constrain their future plans for their Glenmill flats or their currently under-utilised land - BLUE on plan.There is an obvious opportunity to form a partnership with RHP to develop RHP's under-utilised Glenmill land, but we understand that any such development plans by RHP of their land are currently in abeyance.</p> <p><b>Barriers to delivery:</b> No. However, there is a public sewer running across our land (without manholes)- marked. A Thames Water build-over agreement would be required.</p> <p><b>[See Appendix for sketch]</b></p>
83.	Chris O'Rourke	<p><b>In what capacity are you responding to this consultation:</b> I live in the local area</p> <p><b>Site Location:</b> Greggs Bakery site</p> <p><b>Type of Development:</b> Other</p> <p>A low density development, considerate to the local area with a limited number of residential sites and commercial space for local businesses.</p> <p><b>Potential scale of development:</b> The development should be low rise, not higher than the current building profile. The development should be self contained for parking needs and open space. The development should take into consideration local traffic and public transport</p>

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		<p>constraints. The development should also facilitate additional access opportunities with bridges and pathways to the parks and reserves located on the other side of the river.</p> <p><b>Site availability:</b> The site is ready for development now.</p> <p><b>Potential Constraints:</b> Road access in the area is constrained and this needs to be considered by the development. Parking is also restricted and space for residents must be provided on site. Public transport is limited and the additional burden this will place on local infrastructure needs to be addressed. The development cannot be out of place with the local character in terms of visual appeal and also size. The area has a history of mixed business and residential premises, this should be continued.</p> <p><b>Barriers to delivery:</b> Don't know</p>
84.	Natasha Waithe	<p><b>In what capacity are you responding to this consultation:</b> I live in the local area</p> <p><b>Site Location:</b> Greggs Bakery</p> <p><b>Type of Development:</b> Housing</p> <p><b>Potential scale of development:</b> the amount of flats and people area concern as we have a sever lack of parking and the streets are very narrow. I am concerned that the traffic increase will be too great for the all the narrow roads to handle. Also there doesn't appear to be any green space on the proposed plans.</p> <p><b>Site availability:</b></p> <p><b>Potential Constraints:</b> I am concerned about the height of the flats. We were hoping to get rid of the looming factory towers from Green bakery but disappointingly the height of the proposed flats is worse.</p> <p><b>Barriers to delivery:</b> Don't know. HGV access has already been already been stated as a restraint but the building work for 2 + years will mean a high increase of HGV's on the narrow surrounding streets.</p>
85.	Malcolm Hay	<p><b>In what capacity are you responding to this consultation:</b> I live in the local area</p> <p><b>Site Location:</b> Greggs Bakery site</p> <p><b>Type of Development:</b> Housing</p> <p>Housing, and especially affordable housing, is in drastically short supply throughout the UK and the number of people being housed away from permanent homes is growing when it should be reducing. The Government has for many years had a target of 300,000 homes to be built per year and has fallen consistently short every year. Richmond must play its part.</p> <p><b>Barriers to delivery:</b> Don't know</p>
86.	Hester Huttenbach	<p><b>In what capacity are you responding to this consultation:</b> I live in the local area</p> <p><b>Site Location:</b> Greggs Bakery site, Colne Road</p> <p><b>Type of Development:</b> Leisure and Housing</p> <p>I approved the plans submitted but would like to see as much space left open as possible to trees, grass and shrubs. Maybe a small children play space.</p> <p><b>Potential scale of development:</b> Living on the opposite side from the site I would not be affected by heights but i appreciate that the odd numbers are concerned about being overlooked. As the new houses would have a small garden it should not create a problem as these roads have always been back to backs and a certain lack of privacy has never been an issue (I have lived her for 35 years)</p> <p><b>Site availability:</b> Hopefully the development will get the go ahead as it has been vacant for some considerable time.</p> <p><b>Barriers to delivery:</b> Don't know</p>
87.	Clarissa Louise Angus	<p><b>In what capacity are you responding to this consultation:</b> I live in the local area</p>

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		<p><b>Site Location:</b> Green spaces  <b>Type of Development:</b> Leisure  <b>Barriers to delivery:</b> don't know</p>
88.	Defence Infrastructure Organisation on behalf of the Ministry of Defence	<p><b>In what capacity are you responding to this consultation:</b> landowner  <b>Site Location:</b> Kneller Hall, Kneller Road, Twickenham TW2 7DU  <b>Type of Development:</b> Retail, Leisure, Cultural, Office, Housing &amp; Other  The site is the subject of Policy SA14 in the adopted Richmond Local Plan and is also the subject of a site specific development brief, the Kneller Hall Development Brief 2020. The site is suitable for a number of uses including residential. The site should be included in the new local plan.  <b>Potential scale of development:</b> The potential development is described in Policy SA 14 and the potential scale of development and the amount of development and range of uses that the site can accommodate is described further in the development brief for the site.  <b>Site availability:</b> Currently it is planned that the site will be available for development in 2021.  <b>Barriers to delivery:</b> No. Not aware of any currently.</p>

#### Appendices:

- 2. CBRE on behalf of LGC Teddington
- 21. Lucy Wakelin, Transport for London Commercial Development
- 24. Paul Velluet
- 34. DP9 Ltd on behalf of Harlequin Football Club Limited
- 55. Jon Rowles
- 73. Pegasus Group on behalf of Sheen Lane Developments
- 74. Savills on behalf of Thames Water
- 75 (a) David Taylor
- 79. Max Hampton
- 82. Campbell Brown