

Summary of all main issues raised during the Publication Local Plan (Regulation 19) consultation and Summary of the Council’s response

The table below provides a summary of main issues only; in order of the Plan (details in italics are cross-references); comments are not in order of priority.

The Council has provided brief responses to the main issues it has identified and to any substantial concerns about soundness or legal compliance raised in the representations.

The Schedule of responses to the Publication (Regulation 19) Local Plan (in plan order) with the Council’s response to each comment is available separately.

Below this table is also a summary of each comment.

Summary of all main issues raised during the Publication Local Plan (Regulation) consultation	Summary of Council’s response to the main issues
General/Introduction	
<ul style="list-style-type: none"> Some comments collated against the general/introductory parts of the Plan which raise broader issues or issues that have not been covered elsewhere. There are some raising concern about the general approach (Elena Mikhaylova, Julie Scurr, Jon Rowles) but others in support (Mary Stone, Solomon Green). Mortlake with East Sheen Society comment on the structure of the plan (also raised by Old Deer Park Working Group and Prospect of Richmond), and while consider the strategy appropriate and deliverable, raise concerns about the cumulative impacts and cross-boundary matters. Councillor Niki Crookdake raises concerns about the unprecedented development in the east of the borough and the transport impacts. The Royal Parks raise general issues of air and light pollution. The Home Builders Federation raise the plan period should be clearly stated. Hampton Hill Residents and John Webb raise reference should be made to the Localism Act 2011 and the duty to take account of responses to consultation, in relation to the decision-making process and predetermination. Jon Rowles raises central Twickenham will have fewer protections and there should be commitment to a new Village Planning SPD or replacement Area Action Plan. The River Thames Scheme wish to see the proposed upgrades to Molesey Weir and Teddington Weir shown on the Policies Map. Sport England request an update on the Indoor Sports Facility assessment. Prospect of Richmond and Old Deer Park Working Group question the analysis and recommendations in the Urban Design Study and MOL review. Some raising detailed points on the strategic context and trends, including in relation to Heathrow (Clare Wilmot, Prospect of Richmond, Old Deer Park Working Group). Comments in relation to the supporting documents – the Sustainability Appraisal, the Habitats Regulation Assessment, and the Sequential Test Report. The Royal Parks raise comment on the Habitats Regulation Assessment in terms of Richmond Park SAC. Friends of Richmond Park comment on the assessment of air pollution on the Richmond Park Special Area of Conservation in the Habitats Regulation Assessment, querying the assumption that only the primary road network is likely to experience any significant increases in vehicle traffic as a result of development. The Environment Agency acknowledge the previous responses to comments on the SA objectives. <i>A comment is raised under the Place-based Strategy for Ham, Petersham & Richmond Park that the Sustainability Report does not consider the recreational stress on Richmond Park and the cumulative impact of adjacent development in Kingston upon Thames, see Jon Rowles. A comment on Policy 8 raises concerns about a mismatch between the Sequential Test Report,</i> 	<ul style="list-style-type: none"> Given the plan is to be read as a whole, and some wider issues are beyond the remit of the Local Plan, no additional modifications are considered necessary, however some cross references and updates could be considered to the introductory text, for example to reflect the Levelling Up & Regeneration Bill is now an Act. An additional modification could be considered to reference the Mayor’s Vision Zero Strategy in supporting text (<i>see Policy 1</i>) and update once the Indoor Sports Facility needs assessment is completed in 2024 (<i>Policy 49</i>). See the Statement(s) of Common Ground with a number of the Duty to Cooperate bodies, which include reference to the Background Topic Papers drawing together information including on transport impacts and housing delivery.

<p><i>Sustainability Appraisal, SFRA and policies and the lack of a joined up approach, including considering all sources of flooding, see Alan Smith.</i></p> <ul style="list-style-type: none"> • Some respondents outline the context for their wider comments, particularly organisations and groups, or those on particular sites (Home Builders Federation, Udney Park Playing Fields Trust, Royal Botanic Gardens Kew, Notting Hill Genesis, Environment Agency, London Historic Parks and Gardens Trust). • Some respondents wished to reiterate comments made to the Regulation 18 consultation (Prospect of Richmond, The Royal Parks, Old Deer Park Working Group, The Royal Parks). • Some respondents raising no comments (Port of London Authority (PLA), Runnymede Borough Council). • Some Duty to Cooperate bodies note the context and general comments (along with other detailed comments): <ul style="list-style-type: none"> ○ Royal Borough of Kingston upon Thames do not wish to comment on soundness; ○ Spelthorne Borough Council acknowledge agreed strategic and cross-boundary matters; ○ Historic England welcome the approach to the historic environment in the Plan; ○ National Highways outline their role as the highway authority, traffic authority and street authority for the Strategic Road Network (SRN) and need for assessment of the traffic implications of the Plan; ○ Transport for London (TfL) indicate support for the 20 minute neighbourhood concept, reduce the need to travel and improve sustainable travel choices, although wish to see reference to the Mayor’s Vision Zero ambition for road safety and with regard to a boroughwide strategic transport assessment will review the forthcoming background paper; ○ Natural England are content the Plan will not have an adverse impact on the natural environment or designated sites and have no comments; ○ Elmbridge Borough Council acknowledge ongoing engagement and agreed strategic and cross-boundary matters, including through a Statement of Common Ground; ○ GLA on behalf of Mayor of London raise in terms of general conformity with the London Plan, Policy 11 on affordable housing threshold approach is not in general conformity with Policy H4 and will potentially result in fewer affordable homes being delivered across the plan period; ○ London Borough of Hounslow broadly supporting of the overall spatial strategy including focus on Living Locally, but raise a holding objection pending further information in relation to transport and highways impacts of the Plan, acknowledge further liaison including through a Statement of Common Ground. 	
<p><i>Vision and Strategic Objectives, Spatial Strategy, Place-Based Strategies and Site Allocations</i></p>	
<ul style="list-style-type: none"> • Some general support for the vision and the strategic objectives. The Environment Agency suggest using nature flood management techniques should be referenced in the strategic objectives. The Richmond Society suggest the vision should clarify the ageing population in relation to whether walking/cycling for the 20 minute neighbourhood, and the strategic objectives should reference those with mobility issues in relation to improving connectivity and accessibility. 	<ul style="list-style-type: none"> • An additional modification to the strategic objectives to reference nature flood management could be considered. While there is clarity in the Plan that the 20-minute

<ul style="list-style-type: none"> • Some broad support for the ‘living locally’ concept set out in Policy 1, including from some organisations with similar objectives and how particular sites can contribute. Some concerns (Gary Hageen, Elena Mikhaylova, Richmond Society) about restrictions on movement and the consultation on this policy. Some concerns about particular aspects of implementation including the definition of the 20-minutes (CPRE London, Jon Rowles), provision for those less mobile (Richmond Society), importance of safe cycle routes and parking (Julie Scurr), reference to protecting and enhancing open space (London Historic Parks and Gardens Trust), and whether there could be better support for the rail network (Network Rail). • A few comments on specific aspects of Policy 2 and the spatial strategy, along with some support. Royal Botanic Gardens Kew comment the key diagram should not identify a large proportion of Kew Gardens as within the incremental intensification area and an area deficient in public open space, as may facilitate inappropriate development. Mortlake with East Sheen Society raise concerns on the order of the plan leading with the spatial strategies, and the boundaries of these nine areas, particularly with the older parish boundary and relationship with Richmond Park. Old Deer Park Working Group and Prospect of Richmond reiterate comments on limited population growth and the places where it will decline, although emphasising prosperity will be increasing. • Comments on the Place-Based Strategies and Site Allocations were generally in relation to specific places or sites, or what is not included, with some comments on the nature of the Site Allocations and a few comments about the overall approach or structure of the plan. Jon Rowles raises the place strategy should be amended to ensure the places/towns are not too big, and should each have statements to show local priorities, with each area encouraged to have a full neighbourhood plan. Transport for London (TfL) welcome the context in the Site Allocations on transport/highways but recommend PTAL is stated as a numeric score and remove any subjective grading. Historic England welcome the context details on heritage assets and references to evidence and guidance, but for a limited number of allocations in the most sensitive locations consider there is further work to be done to ensure heritage significance is properly assessed, reflected and therefore conserved and where possible enhanced, with clarity on how development should manage impacts; also refer to inclusion of text to ensure GLAAS consulted early with regard to place making and public benefit opportunities, and note they are APAs rather than zones. Sainsburys Supermarkets Ltd raise concerns in the wording of the site allocations for the Sainsburys sites (detailed below). The London Borough of Hounslow note a number of site allocations close to the shared boundary and that no minimum development quanta or parameters are set and request if development comes forward there is engagement through Development Management to ensure cross-boundary impacts can be assessed and addressed. Thames Water as the statutory water supply and sewerage undertaker provide detailed comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure but also where detailed modelling may be required to refine requirements; raise early engagement between developers and Thames Water would be beneficial, as note upgrades can take time and it may be necessary to condition to ensure development doesn’t outpace upgrades. 	<p>neighbourhood concept does not represent a fixed geography and the ambition to improve accessibility for all is already referenced in the strategic objectives, an additional modification to reference improving public transport options in the vision could be considered.</p> <ul style="list-style-type: none"> • As strategic policies guiding the overall Plan approach, Policy 1 sets the broad concept for Living Locally and Policy 2 the spatial strategy, and no additional modifications are considered necessary on the broad approach in response to comments. <i>An additional modification to paragraph 4.8 could be considered to reference the Mayor’s Vision Zero Strategy.</i> • The Place-Based Strategies and Site Allocations provide an appropriate framework to guide place-making and development proposals, avoiding overly prescriptive details so further work can determine details including appropriate site capacity. • An additional modification could be considered to add to the reference in the supporting text to Policy 33 to early involvement of GLAAS. • A number of additional modifications could be considered to the Place-based strategies and Site Allocations in relation to factual corrections and typos. • Additional modifications to Site Allocation 4 Car Park for Sainsburys and Site Allocation
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- A large number of comments were received on two specific areas proposed as mid-rise zones around Teddington, and the St Clare mid-rise zone, particularly from residents with concerns about the impact of development which are considered against the relevant place-based strategy (see further below).
- There are a number of specific sites suggested for inclusion as Site Allocations (so-called omission sites): **LGC site** is promoted as a mixed-use allocation (LGC LTD); **Arlington Works** should be allocated for mixed use development (Arlington Works); **Chertsey Court** should be a site allocation, for redevelopment to provide affordable homes or a school site, as option to include in the Stag Brewery Site Allocation (Councillor Niki Crookdake); car parks could be removed and replaced by mixed-use development – **Richmond Waitrose car park, Paradise Road multi-storey car park, Waitrose West Sheen, and Tesco Teddington** (CPRE London); **Land to West of Stain Hill West Reservoir**, Hampton Water Treatment Works, Upper Sunbury Road for residential or mixed-use development (Thames Water), **Hydes Field**, Land to North of Hampton Water Treatment Works, Upper Sunbury Road for water infrastructure and mixed use development (Thames Water).
- There are detailed comments on each of the Place-based Strategies and Site Allocations as follows:
- **Place-based Strategy for Hampton & Hampton Hill:** The Royal Parks raise should include reference to protection of open space, to reflected risk with increased recreational pressure. Thames Water raise Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road should be removed from the Green Belt and proposed for residential or mixed use development; disagree with the Green Belt review and consider site does not perform strongly in Green Belt terms. Thames Water raise Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road should be removed from the Green Belt and proposed for water infrastructure and mixed use development; disagree with the Green Belt review and consider site does not perform strongly in Green Belt terms, and exceptional circumstances to release the site exist as it is currently being assessed for new water supply development and proposed as a new effluent treatment plant for London’s water supply. A large number of comments were received on the St Clare mid-rise zone, mostly from local groups and residents raising concern the site is not appropriate for 5 storey developments, as the area is sensitive to change and this is out of keeping; a planning application has not been passed by Planning Committee.
 - **Site Allocation 1** Hampton Square, Hampton: Transport for London welcome refence to parking in line with London Plan standards but reference to retain parking should be amended. Thames Water require further details to identify any infrastructure impact on the water supply / wastewater.
 - **Site Allocation 2** Platts Eyot, Hampton: Port Hampton Estates Limited raise the existing cottage should be referred to in the existing land use, the planning history should reflect discussions with the landowner and the Council, and should refer to improved vehicular access to support and facilitate redevelopment. Thames Water require further details to identify any infrastructure impact on the water supply / wastewater. The Environment Agency note they are not responsible for assessing safe access and egress, but welcome being referenced in association with works to

- 13** Twickenham Stadium could be considered to the reference to parking in the vision to ensure consistency with the London Plan.
- *An additional modification could be considered to **Site Allocation 21** Kneller Hall for clarity to ensure the vision references correctly the SINIC designation and the need to protect the ecological value of the SINIC in accordance with Policy 39.*
 - An additional modification could be considered to **Site Allocation 31 Kew Retail Park** to clarify that the expectation is that there should be no increase in the amount of convenience floorspace.

determine whether the site should be designated as flood zone 3b. Elmbridge Borough Council raise particular interest in this site allocation given site is on the shared boundary, raise an indicative level of development would be useful and would like to be engaged in any masterplan or brief.

- **Site Allocation 3** Hampton Traffic Unit: the only comment is Thames Water who do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage, noting the site is within 15 metres of a strategic sewer.
- **Site Allocation 4** Carpark for Sainsburys, Uxbridge Road, Hampton: Transport for London (TfL) seek reference in the vision is consistent with the London Plan for parking. Sainsburys Supermarkets Ltd while supporting the removal from MOL and reprovision of petrol station and parking for the foodstore, raise allocation for 100% affordable housing is not justified and remove reference to 20% biodiversity net gain. CPRE London raise this should be a mixed-use development with no surface car parking. Thames Water require further details to identify any infrastructure impact on the water supply / wastewater.
- **Site Allocation 5** Hampton Telephone Exchange (Molesey Telephone Exchange): the only comment is Thames Water who require further details to identify any infrastructure impact on the water supply / wastewater.
- **Place-based Strategy for Teddington & Hampton Wick:** National Physical Laboratory (NPL) raise their site and employees and the contribution this makes to Teddington including as a scientific asset, although recruiting and retaining employees is linked to public transport accessibility and affordable housing. The Royal Parks comment future development plans should include reference to protection of open space, to reflect risk with increased recreational pressure. A large number of comments were received on the Teddington (railway side) mid-rise zone, mostly from local groups and residents raising concerns about the impact on character and that 5-6 storeys is too high, as existing developments should not set a precedent, as well as supporting the existing business park.
- **Site Allocation 6** Telephone Exchange, Teddington: the only comment is Thames Water who do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage.
- **Site Allocation 7** Teddington Delivery Office: the only comment is Thames Water who do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage.
- **Site Allocation 8** Strathmore Centre: the only comment is Thames Water who do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage.
- **Site Allocation 9** Teddington Police Station: Roger Byatt raises priority should be given as relocation for the Park Road Surgery. Thames Water require further details to identify any infrastructure impact on the water supply / wastewater.

- **Place-based Strategy for Twickenham, Strawberry Hill & St Margarets:** Graham Martin raises concern regarding the new pedestrian and cycle bridge to Orleans Road including safety, impact on lighting and local views and objects to this location, but suggests Radnor Gardens could be suitable. The Rugby Football Union (RFU) support the reference added to the Urban Design Study about the Stadium area. Arlington Works raise the site should be allocated for mixed use development. Network Rail (Southern) raise the place-based strategy and site allocations should promote improved access to the rail network for all users and reference developer contributions. Transport Trading Limited Properties Limited (TTLP) support the recognition that the area is an appropriate location for growth; TfL has two significant landholdings in this area.
 - **Site Allocation 10** St Mary's University: Historic England welcome the greater detail in the site context including heritage assets and that this is a highly sensitive site, but raise the site allocation should be more precise about the form development will take given the potential significant effects of new development; analysis of the heritage significance of the wider site can inform site capacity and design parameters. CPRE London raise concern that proposals for the site are very likely to involve inappropriate development on MOL. Thames Water require further details to identify any infrastructure impact on the water supply / wastewater. Sport England support retention or replacement of playing fields and sports facilities. Strawberry Hill Residents' Association raise whether the allocation reflects the aspirations of the University. St Mary's University welcome the site allocation for the main campus but the boundary is incorrect, and raise the Teddington Lock campus should be a separate site allocation or further emphasis given to the vision to enhance the indoor and outdoor sport and recreational use and associated ancillary educational facilities.
 - **Site Allocation 11** Richmond upon Thames College, Twickenham: Thames Water do identify the scale of development in this catchment is likely to require upgrades of the water supply network and recommend early liaison; do not identify any concerns but set out advice for a developer to consider the wastewater / surface water drainage, noting the site is within 15 metres of underground waste water assets. Sport England support reference to protect and upgrade the playing field.
 - **Site Allocation 12** The Stoop (Harlequins Rugby Football Club), Twickenham: CPRE London raise any redevelopment should improve accessibility of the path next to the Duke of Northumberland River. Transport for London (TfL) note the reference to close working with TfL. Thames Water require further details to identify any infrastructure impact on the water supply / wastewater / surface water drainage. Sport England raise it should be clearer in the vision development proposals should not impact on the stadium area. Surrey County Council raise the implications of the allocation on the continued operation of the existing Depot which is a safeguarded waste site.
 - **Site Allocation 13** Twickenham Stadium, Twickenham: Transport for London (TfL) seek reference in the vision is consistent with the London Plan for coach parking and servicing facilities. Thames Water require further details to identify any infrastructure impact on the water supply / wastewater / surface water drainage. Sport England seek

clear reference that proposals should not impact on the stadium area. The Rugby Football Union (RFU) support the allocation but raise there should be specific reference to entertainment in the main description, as it is an important function, and it should be referred to as a sports venue.

- **Site Allocation 14** Mereway Day Centre: the only comment is Thames Water who do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage.
- **Site Allocation 15** Station Yard, Twickenham: Transport for London (TfL) note the reference to adequate standing capacity and drivers facilities. Network Rail (Southern) support the allocation. Transport Trading Limited Properties Limited (TTLP) welcome the allocation which includes the TfL landholding – this has ongoing operational requirements on event days as recognised in the allocation. Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage.
- **Site Allocation 16** Twickenham Telephone Exchange: the only comment is Thames Water who require further details to identify any infrastructure impact on the water supply / wastewater / surface water drainage, noting the site is within 15 metres of underground waste water assets.
- **Site Allocation 17** Twickenham Riverside and Water Lane/King Street: Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater. Transport for London (TfL) welcome the clarification on parking. The Environment Agency support the clarification on flooding.
- **Site Allocation 18** Homebase, Hanworth: Thames Water require further details to identify any infrastructure impact on the water supply / wastewater. Zamir & Violetta Gobra raise about how a development could connect to neighbouring property and wish to participate in the design and development process of future proposals.
- **Site Allocation 19** Fulwell Bus Garage: Transport for London (TfL) support the requirement to retain the bus garage use. Thames Water require further details to identify any infrastructure impact on the water supply / wastewater. Network Rail (Southern) support the allocation, but raise reference should be made to the need to improve station access, as the site also operates as an interchange, and should refer to seeking developer contributions and the IDP. London Borough of Hounslow note the reference to retention and safeguarding of the bus garage operation and if it comes forward urge the Council to work with TfL and bus operators to ensure no interruption and cross-boundary impacts. Transport Trading Limited Properties Limited (TTLP) recognise the requirement to retain the bus garage use, but raise the allocation should: clarify it is expected to be a residential-led development; include properties in Wellington Gardens in the site allocation to enable access to be improved and facilitate place-making; reference the Urban Design Study and the opportunity to create landmark taller buildings.
- **Place-based Strategy for Whitton & Heathfield:** Dukes Education Group and Radnor House School raise the strategy should be updated to reference their proposals for Kneller Hall, as set out in their comments on Site Allocation 21. Whitton Community Association raise the Community Centre should be correctly referred to as a community centre, food bank and pharmacy.

- **Site Allocation 20** Telephone Exchange, Whitton: the only comment is Thames Water who do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage.
- **Site Allocation 21** Kneller Hall: Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage; encourage any development to utilise green SuDS solutions. Sport England support reference to retaining and where possible upgrading playing fields. Dukes Education Group and Radnor House School provide details of their background and proposals, and consider there should be further updating to reflect their client's proposals as the site is not currently publicly accessible and while the proposals are to provide managed access that will improve accessibility for local community groups and schools, it will not provide public green and open spaces or links through the site.
- **Site Allocation 22** Whitton Community Centre: Whitton Community Association raise concerns about the policy aims and how affordable housing will be combined with community use, and does not allow a 100% affordable housing scheme. Joan Gibson and Whitton Community Association point out some incorrect references in the context descriptions. Thames Water require further details to identify any infrastructure impact on the water supply / wastewater / surface water drainage.
- **Place-based Strategy for Ham, Petersham & Richmond Park:** comments relate to the new pedestrian and cycle bridge seeking clarification on details including the location and funding (Ham & Petersham Association & Amenities Group, Daniel Reich, *Graham Martin*). Ham & Petersham Association & Amenities Group raise that six storey buildings is too high, and welcome increased protection for playing fields although raise the implications for existing informal sport and recreation uses at Ham Common West. Jon Rowles raises the cumulative impact of development, including in Kingston, on Richmond Park SAC. The Royal Parks raise Richmond Park should be mentioned in the policy when noting the network of green spaces, and the impacts of development including increased traffic, recreational pressure and light spill on the SAC, SSSI and NNR.
- **Site Allocation 23** Ham Close: the only comment is Thames Water who state the scale of development is likely to require upgrades of the water supply network infrastructure and wastewater network, recommend early liaison and consideration of phasing.
- **Site Allocation 24** Cassel Hospital: West London NHS Trust support the Site Allocation but seek removal of the requirement to explore alternative social and community infrastructure uses which would not be viable, nor is 100% affordable housing justified and marketing should be reduced to 6 months, as well as confirming the Trust continue to occupy a proportion of the buildings. Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage.
- **Place-based Strategy for Richmond & Richmond Hill:** Julie Scurr raises a theme around increasing food and drink provision and Richmond already has enough, the priority should be to attract shopping; not supporting increase in the

night-time economy due to concern about anti-social behaviour and need for policing; welcome station redevelopment, need for a welcoming entrance space but question whether need high-rise. Roger Byatt raises why there are no plans for pedestrianisation in George Street. The Royal Parks raise Richmond Park should be mentioned in the policy when noting the network of green spaces, and the impacts of development including increased traffic, recreational pressure and light spill on the SAC, SSSI and NNR. Network Rail (Southern) raise the place-based strategy and site allocations should promote improved access to the rail network for all users and reference developer contributions. Prospect of Richmond raise the place definitions, that the four Conservation Area components should be separately identified and the character area boundaries should match the Conservation Area boundaries, and the places should be retitled; raise the RBID vision is likely to have bias towards business and only covers parts of the town centre. Old Deer Park Working Group raise the Old Deer Park should be covered by its own Character Area.

- **Site Allocation 25** Richmond Station: The Richmond Society raise developing 7-8 storeys behind the façade would look ridiculous and out of place. CPRE London raise the car park next to the station should be removed and not re-provided, and the space above the railway tracks should be kept open. Thames Water require further details to identify any infrastructure impact on the water supply / wastewater. Baden Prop Limited support the site allocation for a mix of uses, but raise Westminster House should be within the tall building zone as permission has been granted for a 6/7 storey building, and the allocation could be for higher than 8 storeys and should not emphasise office use but a range of alternatives including residential (*see also comments on Employment policies*). Network Rail (Southern) support the allocation and opportunities, and Transport for London (TfL) welcome the reference to a partnership approach. Prospect of Richmond raise the title and draft need text need substantial amendment – should be a distinction between proposals affecting the station and other buildings, with different considerations that apply to the locally listed station and platform-canopies to which there is no scope for redevelopment, and that the opportunity for a landmark building is unacceptable and issues around servicing. *Old Deer Park Working Group and Julie Scurr also raise concern at the support for high-rise development.*
- **Site Allocation 26** Former House of Fraser: Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater. Prospect of Richmond raise needs to be amended to reference any redevelopment provides for enhancement of external elevations and removal of existing roof enclosures to enhance views, and reference any extension or extensions to the existing buildings should rise no higher than the existing building (and for any replacement development).
- **Site Allocation 27** Richmond Telephone Exchange: Thames Water require further details to identify any infrastructure impact on the water supply, but the wastewater network may be unable to support demand and local upgrades to the drainage infrastructure may be required so the developer should liaise with Thames Water. Prospect of Richmond support a low rise development of what is an eye sore.

- **Site Allocation 28** American University: Thames Water require further details to identify any infrastructure impact on the water supply / wastewater / surface water drainage. Prospect of Richmond raise needs to be amended to reference any extension or extensions to the existing buildings should rise no higher than the three-storey part of the existing buildings; and for any replacement development.
- **Site Allocation 29** Homebase, North Sheen: Chris Toop objects to inclusion as site for major development, as against the wishes of vast majority of residents and yet makes planning approval easier for developers. Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater. Network Rail (Southern) support the site allocation, but raise the opportunity to secure improvements to North Sheen train station and additionally the adjacent level crossing should be included in the allocation, with reference to securing safety mitigations as necessary. Avanton Richmond Developments LTD as developer of the site support the vision but raise concern in relation to the height, scale and massing considerations – disagree with the sensitivity and negative qualities for the character area and inadequate testing, and consider maximum of 7-8 storeys prohibits optimisation of the site and housing delivery, when have demonstrated 11 storeys are acceptable. Prospect of Richmond note this is not East Sheen; consider the Urban Design Study flawed analysis and recommendations, and reference to the tall and mid-rise building zone should be deleted and state that any new development across the site to rise no higher than 4 storeys to relate to the predominantly 2 storey scale of nearby residential areas and the nearby Conservation Area.
- **Site Allocation 30** Sainsburys, Lower Richmond Road: Transport for London (TfL) raise reference to re-provide car parking is inappropriate and expectation given PTAL to be car free. Sainsburys Supermarkets Ltd raise the allocation should include a requirement to provide adequate servicing areas. Network Rail (Southern) support the site allocation, but raise the opportunity to secure improvements to North Sheen train station and additionally the adjacent level crossing should be included in the allocation, with reference to securing safety mitigations as necessary. Thames Water raise the scale of development is likely to require upgrades of the water supply network, recommend early liaison and consideration of phasing, but do not identify any infrastructure concerns regarding the wastewater network. Prospect of Richmond raise that given the Urban Design Study flawed analysis and recommendations, reference to the tall and mid-rise building zone should be deleted.
- **Place-based Strategy for Kew:** Julie Scurr raises there will be a massive increase in the population and there is no commitment for increased, visible policing. Network Rail (Southern) support the strategy especially around Kew Gardens Station as well as wayfinding and active travel. Prospect of Richmond and Old Deer Park Working Group raise Old Deer Park should be covered by its own character area, and query the structure of the character areas relating to Richmond, Kew and North Sheen as they should be based on Conservation Areas. *St George plc and Marks and Spencer comment on the reference to the tall-building zone which should include a range between 7-8 storeys, see comments on Policy 45.*

- **Site Allocation 31** Kew Retail Park: Chris Toop objects to inclusion as site for major development, as against the wishes of vast majority of residents and yet makes planning approval easier for developers. Historic England raise the ambiguity and it is not clear how the tall building location has been justified, so further text to ensure what proposals should take into account is necessary. Transport for London (TfL) raise the PTAL baseline should be 2. St George plc and Marks and Spencer support the allocation but are concerned that the restriction on convenience retail provision has been maintained; consider there is a need to improve convenience goods retail provision in Kew to meet main food shopping needs and achieve Living Locally. Thames Water raise the scale of development is likely to require upgrades of the water supply network infrastructure and wastewater network, recommend early liaison and consideration of phasing.
- **Site Allocation 32** Kew Biothane Plant: Melliss Ave Devco Limited (in Administration) c/o RSM raise the permission granted in 2018 which considered very special circumstances and circumstances have not shifted since; the vision is going beyond Policy 35 requirements in requiring improvements to MOL and should be amended to state may comprise a range of housing and that development in MOL would not be acceptable unless very special circumstances outweigh harm to the MOL. The Environment Agency raise the site has been identified as a key opportunity for WFD improvement by way of managed realignment of the flood defence. Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage.
- **Site Allocation 33** Pools on the Park and surroundings: Old Deer Park Working Group raise the Statement of Significance needs to be amended before adoption and the text should take account of repeated community requests for the Pools complex and its surrounding landscape to be designated MOL. Thames Water require further details to identify any infrastructure impact on the water supply / wastewater.
- **Site Allocation 34** Richmond Athletic Association Ground: Sport England support the vision. Thames Water require further details to identify any infrastructure impact on the water supply / wastewater.
- **Place-based Strategy for Mortlake & East Sheen:** Councillor Niki Crookdake suggests a number of changes to the strategy to correct inaccuracies and acknowledge the lack of open green space, the need to upgrade Mortlake High Street, traffic congestion and the PTAL; suggests adding reference to a green link bridge connecting the north and south towpaths, if feasible, and to Chertsey Court as another site allocation. The Royal Parks raise there should be greater recognition of the nature conservation designations of Richmond Park and protection of the parks from recreational pressure, traffic and light spill. Network Rail (Southern) supports the strategy but should reference securing developer and third-party contributions for improving access to and around the station.
- **Site Allocation 35** Stag Brewery: Historic England raise this is a sensitive site and recommend sensitivities set out in the Urban Design Study are included in the Site Allocation. Transport for London (TfL) support the requirement for bus standing space within the site, but do not support the closure of the Avondale Road bus station. Sport England

<p>support reference to retention / re-provision of playing field. Thames Water do identify the scale of development in this catchment is likely to require upgrades of the water supply / wastewater network and recommend early liaison, along with advice to consider surface water drainage. Network Rail (Southern) raise the challenges of the level crossing and to mitigate safety issues the allocation should reference securing developer and third-party contributions for improving access to and around the station. Mortlake with East Sheen Society agree with the height although note the recent approval is higher, but do not accept the need for a secondary school plus sixth form. The Environment Agency raise the site has been identified as a key opportunity for WFD improvement by way of managed realignment of the flood defence. Councillor Niki Crookdake suggests a number of changes to the site allocation including references to enhancing green infrastructure initiatives, a school if capacity is required, a green link with the Thames Towpath, specific congested roads.</p> <ul style="list-style-type: none"> ○ Site Allocation 36 Mortlake and Barnes Delivery Office: the only comment is Thames Water who do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage. ○ Site Allocation 37 Telephone Exchange and 172-176 Upper Richmond Road West: the only comment is Thames Water who do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage. ○ Site Allocation 38 Barnes Hospital: Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage. <ul style="list-style-type: none"> ● Place-based Strategy for Barnes: Network Rail (Southern) support the strategy and policy initiatives around the stations and are keen to work with the Council to identify funding, suggest a similar approach could be adopted for other stations in the borough. 	
<p><i>Theme: Responding to the climate emergency and taking action</i></p>	
<ul style="list-style-type: none"> ● On this theme overall, comments were largely supportive of addressing climate change, although some questions on the justification, particular aspects of policies, and particularly regarding impacts on developers. Historic England support the Plan in addressing the challenges of climate change but seek to make it clear in this chapter risks of inappropriate retrofit measures to historic buildings and should make it clear that refurbishment/retrofitting projects to improve energy efficiency also need to satisfy requirements elsewhere in the Plan. Elena Mikhaylova raises there is no climate emergency and the approach in Policies 3 to 5 has not been asked for by local people. ● In specific relation to Tackling the climate emergency (Policy 3), the Richmond Society raise the need to retrofit to meet targets and suggest part D should refer to water efficiency. Richard Mundy also raises that cost-effective decarbonisation measures such as glazing and solar panels in Conservation Areas should be encouraged, along with bike shelters and car charges. The Home Builders Federation raise the implications of part B.1 for residential 	<ul style="list-style-type: none"> ● Policy 3 is considered to provide an appropriate strategic framework for tackling the climate emergency, an additional modification could be considered to add reference to encourage in retrofitting measures to improve water efficiency in part D. ● Policy 4 is considered to provide an ambitious policy framework to assess proposals, informed by the evidence base. An Additional Modification could be

development are unclear. The Environment Agency raise the link between the biodiversity and climate crisis should be expanded in the policy.

- In relation to Minimising Greenhouse gas emissions and promoting energy efficiency (**Policy 4**), a number of developers raise concerns about the ambitions, the deliverability of the standards and the carbon offset rate. The Home Builders Federation raise it is not feasible technically to build to net zero and the Council should follow the Government's stepped pathway to net zero, raising impacts on building safety, and affordable housing supply due to the impact on viability. Avanton Richmond Developments LTD raise GLA guidance states carbon cash-in-lieu payments should not place an unreasonable burden on development and there is no evidence or viability testing of this, and the general impact of policies going beyond national and London Plan policies given the viability. St George plc and Marks and Spencer raise references to Building Regulations Part O are incorrect as TM52 relates to non-domestic and TM59 to domestic, and note the introduction of Energy Use intensity reporting, but raise there is no evidence or viability testing of the carbon offset payment rate and places an unreasonable burden contrary to GLA guidance. Notting Hill Genesis welcome the aspirations but raise concern the requirements beyond the London Plan without evidence-based justification, in relation to 60% on-site carbon reduction and the higher carbon offset rate, that will impact on viability and has not been tested. Reselton Properties raise concern about the higher carbon offset rate and the impact on viability, suggesting the policy should allow the payment to be directed to other Plan priorities where appropriate. McCarthy & Stone Retirement Lifestyles Ltd raise confusion with Policy 6 about the standards, and the approach should be stepped in line with Government targets – combine with Policy 6 or delete this policy. The Richmond Society raise the need to mention retrofit in the policy. Royal Botanic Gardens Kew wish to be involved in any further guidance on energy efficiency in historic buildings.
- *In relation to Energy Infrastructure (**Policy 5**), the only comment raised is Elena Mikhaylova as referred to above in this theme.*
- In relation to Sustainable construction standards (**Policy 6**), Thames Water seek the reference to water conservation/efficiency to be strengthened, raising the need to apply through Building Regulations where there is a planning condition, and prefer achieving through the Fittings Approach. Elena Mikhaylova raises the requirement to incorporate maximum water consumption targets is a violation of human rights. St George plc and Marks and Spencer raise the ban on gas boilers after 2024 is not consistent with national policy, and the London Plan and guidance allow low NOx gas boilers in certain circumstances, in line with the energy hierarchy. Notting Hill Genesis raise the requirement for BREEAM Outstanding is onerous and could affect viability, and policy references should be replaced with the London Plan BREEAM minimum performance. *McCarthy & Stone Retirement Lifestyles Ltd raise the confusion as set out above against Policy 4.*
- In relation to Waste and the circular economy (**Policy 7**), Arlington Works raise the future use of the site, as the waste use ceased more than 5 years ago and there is no reasonable prospect of an application coming forward for a waste

considered to correct the reference to Part O of the Building Regulations.

- No additional modifications are considered necessary to **Policy 5** in response to comments.
- **Policy 6** is considered an appropriate approach for sustainable construction standards. An additional modification could be considered to clarify the approach to the water consumption target and the water efficiency standards.
- No additional modifications are considered necessary to **Policy 7** in response to comments.
- **Policy 8** is considered to provide an appropriate framework to assess flood risk. A number of additional modifications could be considered – including to remove the term minimise from part A, amend parts B, D and E, reference the latest TE 2100 Plan and its Riverside Strategy Approach, clarify reference to the national climate change allowances guidance, and to add additional reference in the supporting text to the River Thames Scheme and emphasis around sustainable drainage. See further details in the Statement of Common Ground with the Environment Agency.
- **Policy 9** is considered to provide an appropriate framework for water resources and infrastructure. An additional modification could be considered to move the subheading for part B of the policy. An

use, therefore the Local Plan is the most appropriate way to release the site. Surrey County Council raise reference should be made in the policy to the waste hierarchy, and to the National Planning Policy for Waste in terms of determining applications for non-waste development in the context of sustainable waste management. The Environment Agency request a reference in the policy to a Construction Environment Management Plan.

- In relation to Flood risk and sustainable drainage (**Policy 8**), Alan Smith raises there is a mismatch in information in the Plan and other publications and feels there should be a joined-up river basin strategy with focus on mitigating flooding by upper river risk management; concerns including tidal/storm surge, flood insurance scheme, life safety and property damage from all the sources of flooding. Thames Water support the policy approach to sewer flooding and the requirements around sustainable drainage and protecting basements. Surrey County Council note reference to the River Thames Scheme and suggest the policy could be made more concise and further reference added to the supporting text. The River Thames Scheme raise additional text should embed the Council's support for the scheme and add further details. Avanton Richmond Developments LTD raise part A applies the sequential approach to the layout of sites, a more restrictive requirement than national policy and is not justified. The Environment Agency raise detailed comments supporting parts of the policy but also raising comments and recommending amendments, including to remove 'minimise' from part A, part B should be clearer on tidal and fluvial mapped depths or not mention any depths, part D should reference storage for all three sources of flooding and make clear the type of storage/attenuation sought, the intent of part E should be clarified, part J should reference the latest Thames Estuary 2100 Plan, recommend reference to a Riverside Strategy Approach, clarify part L reference to the national climate change allowances guidance. The Environment Agency also comment on the design of SuDS to maximise ecology and aesthetic value and improve water quality, and suggest emphasis on soft engineering in riverbank protection.
- In relation to Water resources and infrastructure (**Policy 9**), the Home Builders Federation raise part D of the policy is unjustified as applicants are not providers of water services and applicants cannot deliver, and this is covered by a separate statutory regime; the statutory Water Resources Management Plan produced by Thames Water does not identify any major issues of water supply and wastewater treatment. Thames Water support the policy and the approach and will work with developers and local authorities to ensure any necessary infrastructure reinforcement; part B should be located under the 'Water and Sewage Infrastructure' heading. The Environment Agency recommend advice on how the Water Framework Directive (WFD) waterbodies can achieve good ecological status/potential, via methods such as river restoration and soft engineering approaches to bank protection; note requirements for construction management plan at part C but should expand to main rivers and watercourses; and the Plan should recognise the borough has been classified as an area of serious water stress and there is limited water resource availability, along with demand and supply issues set out in Water Companies Water Resource Management Plans.

additional modification could be considered to reference WFD waterbodies achieving good ecological status/potential.

Theme: Delivering new homes and an affordable borough for all

- On the strategic approach to housing, the GLA on behalf of the Mayor of London, Spelthorne Borough Council and Elmbridge Borough Council comment on overall housing need and delivery, also noted by the London Borough of Hounslow. Comments include seeking clarification of the target and how it will be met, and any unmet needs with neighbouring authorities and cross-boundary considerations.
- In relation to New Housing (**Policy 10**), comments were raised on a number of specific aspects. LGC LTD raise the longstanding under provision of affordable homes and should be taking a balanced approach to mixed use development while ensuring no net loss of employment, and highlighting that payments in lieu from small sites cannot easily contribute to affordable housing delivery and should promote intensification or co-location within locally significant employment sites and realise brownfield capacity. The Royal Parks note the number of homes to be delivered within close proximity to Richmond Park and Bushy Park which would result in intensification of visitors to the Parks, and the need to capture some of the value of those developments. Arlington Works raise the housing target should align with the LHNA figure. Elmbridge Borough Council and Notting Hill Genesis raise the lack of indicative unit numbers for the Site Allocations. The Home Builders Federation raise the plan period is unclear, recommend rolling forward the 411 homes per annum after the ten year period, and that a stepped trajectory should not be necessary. Councillor Niki Crookdake raises the indicative housing ranges by broad location are below current forecasts and underestimates impact on infrastructure and transparency. Avanton Richmond Developments LTD raise the broad locations should be based on the 'places' in the Plan and should set minimum targets, covering 15 years. St George plc and Marks and Spencer raise the operating period and the housing requirement, exceeding the housing target, housing trajectory and broad locations for growth. William Grant & Sons Ltd note the reference for potential enabling housing on employment land if compliant with employment policies.
- In relation to Affordable Housing (**Policy 11**), there are a number of comments generally about the difficulty in delivering affordable housing, particularly in light of other policy requirements that impact on viability. There are a number of comments on specific aspects of the policy approach, relating to:
 - Seeking at least 50% affordable housing (McCarthy & Stone Retirement Lifestyles Ltd raise this is higher than the London Plan and against the viability evidence, Transport Trading Limited Properties Limited (TTLP) raise public sector landowners can agree a portfolio approach to delivering 50% affordable housing across London).
 - the tenure split / housing mix (Reselton Properties raise there should be flexibility to increase intermediate housing, Councillor Niki Crookdake raises priority for larger family homes);
 - raising concern that the Council is not following the London Plan threshold approach (GLA on behalf of Mayor of London who raise this is not in general conformity with the London Plan, Home Builders Federation, Jon Rowles, McCarthy & Stone Retirement Lifestyles Ltd, St George plc and Marks and Spencer, Avanton Richmond Developments LTD, Notting Hill Genesis);
- See the Statements of Common Ground with a number of the Duty to Cooperate bodies, which include reference to the Housing Delivery and Affordable Housing Background Topic Papers which set out further details.
- **Policy 10** is considered to provide an appropriate strategic policy framework to assess new housing, along with the other housing policies in this theme dealing with specific types of housing or sites, and no additional modifications are considered necessary in response to comments. An additional modification could be considered to add the latest Housing Trajectory to the Plan.
- No additional modifications considered necessary to **Policy 11** in response to comments, as the Council considers provides a policy framework to maximise affordable housing delivery to meet local needs in the borough context, based on robust evidence on housing needs and viability. It may be that further sensitivity testing of the Whole Plan Viability Assessment can be done during the Examination process. An additional modification could be considered to update the supporting text to reference the correct estimate of annual need from the LHNA as including 284 affordable home ownership products.

<ul style="list-style-type: none"> ○ the application of the policy to all sites (Home Builders Federation raise it should not apply to small sites, McCarthy & Stone Retirement Lifestyles Ltd who raise it should not apply to older persons housing, <i>William Grant & Sons Ltd note the application of differential rates on former employment sites</i>); ○ the viability testing (Home Builders Federation raise it shows the difficulty in achieving 50%; Jon Rowles raises the costs where the Council is going further than the NPPF; McCarthy & Stone Retirement Lifestyles Ltd raise the viability of older persons housing is not tested; Councillor Niki Crookdake raises actual developer financing costs and profits are very different and should be used; St George plc and Marks and Spencer raise sites with existing retail uses have not been tested and query a number of assumptions, valued and costs used, and that is shows the majority of typologies are unviable; Avanton Richmond Developments LTD query the costs and values are out of date and shortcomings in the typologies, and that is shows the majority of typologies are unviable); ○ Review mechanisms (McCarthy & Stone Retirement Lifestyles Ltd raise this should not be a burden on all development); and ○ Vacant building credit (McCarthy & Stone Retirement Lifestyles Ltd should apply). ○ In relation to the LHNA, St Mary’s University highlight regarding provision of student residential accommodation: accommodation projections should reflect on-site capacity increase to 950 units (not 893) and it should be made clear the statement - there is no requirement to increase the overall housing need on the basis of student growth - will not apply if their predicted growth in residential cannot be contained within existing landholdings. ● In relation to Housing Needs of Different Groups (Policy 12), there are a number of comments in relation to housing for older people. The Home Builders Federation (HBF) and McCarthy & Stone Retirement Lifestyles Ltd raise the policy should set a more positive framework for older person’s housing schemes. Star Land Realty object to the requirement for affordable housing applying to all residential uses, as care home accommodation should be excluded. St George plc and Marks and Spencer also raise about the type of residential the policy applies to and query the higher standards of accessible and inclusive design – the latter point also being raised by McCarthy & Stone Retirement Lifestyles Ltd. McCarthy & Stone Retirement Lifestyles Ltd question the viability of specialist older persons housing has not been tested. Councillor Niki Crookdake raises RPs should not be able to change a supported housing development, and there should be more to support key worker provision. London Borough of Hounslow note the updated research on Gypsies and Travellers. <i>A comment in respect of The Boathouse site, and the contribution to meeting identified specific community housing needs, see comment under Policy 35.</i> ● In relation to Housing Mix and Standards (Policy 13), Habinteg support the policy and the specific standards for inclusive housing, but suggest additional policy wording to emphasise how applies across all tenures and within developments. Councillor Niki Crookdake raises the reference to ‘small units’ and market 2 and 3 bed units does not reflect the LHNA priorities. St George plc and Marks and Spencer raise issues regarding the likely effectiveness of the policy – clarify the standard referred to is the NDSS, clarify winter gardens can be an appropriate form of amenity on 	<ul style="list-style-type: none"> ● Policy 12 is considered to provide an appropriate framework to assess housing needs of different groups, based on the Council’s evidence base. An additional modification could be considered to update the supporting text to reference the London-wide Gypsy and Traveller accommodation needs assessment is now due to be published in 2024. ● Policy 13 is considered to provide an appropriate framework to assess housing mix and standards. An additional modification could be considered to update the supporting text as the Housing Design Standards LPG has now been finalised. ● No additional modifications are considered necessary to Policy 14. ● No additional modifications are considered necessary to Policy 15 in response to comments. ● No additional modifications are considered necessary to Policy 16 in response to comments.
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<p>constrained sites to overcome issues of noise and air pollution, and clarify private amenity space relates to the London Plan minimum standards and can be accessed from bedrooms. <i>A comment is raised in respect of Policy 45 that also comments on property prices and raises whether there are controls on the types of dwellings allowed, see Jenny & Rod Linter.</i></p> <ul style="list-style-type: none"> • In relation to Loss of Housing (Policy 14), the only comment raised is in respect of The Boathouse site suggesting the approach to loss of housing is too restrictive, as replacement housing will meet housing needs, see comment under Policy 35. • In relation to Infill and Backland Development (Policy 15), the Home Builders Federation consider emphasis on the Areas for Intensification is too limiting and all brownfield sites in the borough should be considered favourably. • In relation to Small Sites (Policy 16), The Royal Parks comment the London Plan priority to increase delivery from small sites is not at the expense of open space; sites could be close to Royal Parks and impact individually or cumulatively, and should be addressed in the policy. London Historic Parks & Gardens Trust seek part D to be rephrased to refer to no net loss of existing biodiversity, open space or garden land, with reference to offset of unavoidable loss through open space provision elsewhere. The Home Builders Federation raise the Plan requirements for net zero homes and affordable housing are not conducive to encouraging small sites, and it is unclear if the Council has been able to identify and allocate any small sites; small sites in any location should be considered favourably as this fits with other parts of the Plan and the Areas for Intensification omit sizeable areas of the borough that enjoy public transport connectivity and have district centres such as Ham. <i>A comment in respect of The Boathouse site, and the contribution to housing delivery on a small site, see comment under Policy 35.</i> 	
<p>Theme: Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic</p>	
<ul style="list-style-type: none"> • In relation to this theme, there are some comments from developers on specific aspects of the policies and how they relate to specific sites, and some comments from some local groups and individuals raising in particular, concerns about changes in the retail sector or local impacts. Claire Wilmot raises importance of local shops and parking space, as well as waste solutions for flats. No comments were received on Appendix 1 presenting maps of proposed town and local centre boundaries and the primary shopping areas. • In relation to Supporting our Centres and Promoting Culture (Policy 17), St George plc and Marks and Spencer raise: part A of the policy should be amended to include reference to major retail and leisure development also being directed to allocations, and amend the supporting text to remove the theoretical assumption that all new town centre uses should be accommodated in vacant shop units and re-purposing existing retail floorspace does not mean that there is no requirement to allocate sites for major retail development. The retail hierarchy should define which locations are town centres through an assessment of scale, role, catchment and function, to comply with the NPPF; and the role and function of the various tiers, to assist with the operation of the sequential and impact tests. The evidence 	<ul style="list-style-type: none"> • Policy 17 is a strategic policy which provides an appropriate framework for supporting the borough’s centres and promoting culture, and was updated at Regulation 19 stage based on updated research. No additional modifications considered necessary in response to comments. • Policy 18 is considered to provide an appropriate framework for assessing proposals for development in centres. An additional modification could be considered to cross-reference at part C that major trip-generating development should be located

<p>base is out of date due to the age of the household survey, or will be due to new Experian economic forecasts in January 2022.</p> <ul style="list-style-type: none"> • In relation to Development in Centres (Policy 18) St George plc and Marks and Spencer raise: the Plan should provide town centre and primary shopping area boundaries; that Part C of the Policy requires major development that generates high levels of trips to be located within a town centre boundary, but this is not consistent with other parts of the Plan, notably the Site Allocation for Kew Retail Park; Part F states out of centre development is not considered appropriate in line with the London Plan, but the London Plan does not preclude it; Part F refers to the sequential test for main town centre uses and impact assessments for retail and leisure, but should refer to proposals outside of defined centres and not in accordance with an up to date development plan; the sequential test should not apply to proposals at Kew Retail Park (or any other retail allocation); and similar inconsistencies in relation to the impact test. They also raise Part C is inconsistent with Part G in relation to major trip generating development. The Rugby Football Union (RFU) also raise the high level of trips from attractions such as Twickenham Stadium. The Richmond Society raise the need for deliveries including for couriers. Solomon Green notes changes in the type of shops available in Sheen. Prospect of Richmond raise concern that the character of Richmond Town will be harmed by an imbalance of the amount of and type of development, and recommend reports be updated and coordinated with sensitivity analysis, as do not believe there are robust estimates to support major development at Richmond Station or higher buildings. The Theatres Trust welcomes the support for cultural quarters. • In relation to Managing the Impacts of Development on Surroundings (Policy 19), the Theatres Trust recommend a reference in policy to include cultural and live performance venues to support activities outside of licensable activities. Prospect of Richmond seek greater distinction between the evening and night-time economies, and oppose supporting a night time economy in Richmond Town Centre and the Riverside due to harm to residents. <i>There are also comments on the Place-Based Strategy for Richmond & Richmond Hill that do not support increasing Richmond’s night time economy and raising anti-social behaviour, see Julie Scurr.</i> • In relation to shops and services serving essential needs, there were no comments on Policy 20. 	<p>within town centres or Site Allocations meeting the requirements of Policy 17.</p> <ul style="list-style-type: none"> • An additional modification could be considered to Policy 19 to widen the application of uses beyond those with late licenses; the planning and licensing policies are considered to provide an appropriate framework to manage impacts. • No additional modifications are considered necessary to Policy 20.
<p>Theme: Increasing jobs and helping business to grow and bounce back following the pandemic</p>	
<ul style="list-style-type: none"> • In relation to this theme and the strategic approach there are a number of comments raised on the Council’s approach, with some support for the aspirations. The GLA on behalf of the Mayor of London seek a breakdown in the different type of industrial space need but consider the approach in Policies 23 and 24 is aligned with the London Plan. Claire Wilmot raises jobs should be encouraged in the right areas, citing refusal of an application on a service yard when the proposal would have realised more jobs. John Rowles raises using the duty to cooperate mechanism to see if Hounslow, Kingston upon Thames or Wandsworth could meet the unmet demand for office and industrial floorspace. London Borough of Hounslow note the approach on employment and will continue liaison through a Statement of Common Ground. 	<ul style="list-style-type: none"> • The approach to employment (Policies 21 to 24) are considered positively prepared and justified, reflecting the evidence base and the London Plan, to support economic growth and enable site-specific proposals to be assessed. No additional modifications are considered necessary, although an additional modification could be considered

<ul style="list-style-type: none"> • A number of respondents raise the policy position particularly in Policy 21 on no net loss is too restrictive (The Offer Group Ltd, Notting Hill Genesis), and similarly on Policy 23 (William Grant & Sons, Michael Amherst, Baden Prop Limited). • A number of comments relate to sector and/or site-specific conditions that necessitate a different policy approach in these cases, including on: Burgoine House (The Offer Group seek the introduction of complimentary alternative uses through intensification, questioning the evidence base and the need for flexibility including taking into account marketing); Platts Eyot (Port Hampton Estates Limited seek site specific conditions to be recognised); St Clare Business Park (Notting Hill Genesis seek removal of no net loss and a reference to where feasible, and that the business park is removed from the LSIS designation); LGC (LGC LTD promote a mixed-use allocation and seeking flexibility in exceptional circumstances, as co-location is allowed for under the London Plan); a small unit in The Quadrant (Michael Amherst, the Article 4 places a blanket ban and the policy should include an exemption particular for vacant small units); Independence House, 84 Lower Mortlake Road (William Grant & Sons Ltd, the site should not be within a Key Business Area as the updated evidence base shows a change in demand and vacancy levels and there should be an appropriate mechanism for the managed release of surplus office space); and Westminster House (Baden Prop Limited, the site should not be within a Key Business Area and the restrictive policy is not justified and should include a mechanism to consider marketing). <i>A comment on National Physical Laboratory (NPL) in relation to the Place-based Strategy for Teddington & Hampton Wick supports the employment policies in bringing and supporting employees, see National Physical Laboratory (NPL). Comments on Appendix 2 that the marketing period for loss of industrial land should be 12 months in line with the London Plan (Arlington Works) and that the blanket protection of offices is not justified and should reference justification supported by evidence of demand and supply (William Grant & Sons Ltd).</i> • Also specifically in relation to Protecting the Local Economy (Policy 21), The Royal Parks note the Parks offer opportunities for economic spin-offs, and specifically in relation to Promoting Jobs and our Local Economy (Policy 22) raise concern the increase in workers increases footfall in the Parks and the need to protect and mitigate additional pressures. • Also specifically in relation to Industrial Land (Policy 24), Notting Hill Genesis raise the affordable workspace requirement ignores this might not be appropriate or compatible in light industrial and should be left to Policy 25. <i>There are comments on St Clare in relation to the use of the business park, see under the Place-based Strategy for Hampton & Hampton Hill.</i> • In relation to Affordable, Flexible and Managed Workspace (Policy 25), there is support for the policy approach. Notting Hill Genesis state the policy should take into account site specific circumstances and viability information. • In relation to the Visitor Economy (Policy 26), the Rugby Football Union (RFU) wish to see Twickenham Stadium referenced in the policy, and similarly The Royal Parks wish to see the Parks referenced. The Theatres Trust support the approach to supporting cultural facilities. 	<p>to reference the GLA's London Plan Guidance on Industrial Land and Uses.</p> <ul style="list-style-type: none"> • Policy 25 is considered to provide an appropriate framework to assess proposals, with no additional modifications considered necessary. • Policy 26 is considered to provide an appropriate framework supporting sustainable growth of the visitor economy. No additional modifications are considered necessary. • Policy 27 is considered to be justified in the approach to assessing proposals. An additional modification could be considered to reference the GLA's London Plan Guidance on Digital Connectivity Infrastructure.
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<ul style="list-style-type: none"> • In relation to Telecommunications and Digital Infrastructure (Policy 27), Mortlake with East Sheen Society and the Richmond Society raise that verified visuals/photomontages would help the public understand applications. National Physical Laboratory (NPL) support the commitment to digital infrastructure. 	
<p>Theme: Protecting what is special and improving our areas (heritage and culture)</p>	
<ul style="list-style-type: none"> • Comments in this theme generally relate to specific aspects of policies, with a number of comments on the emerging Local Views reiterating comments made on the draft Local Views SPD, with general support for the approach to protecting the historic environment. • In relation to Local Character and Design Quality (Policy 28), comments relate to specific issues. National Gas / National Grid Electricity Transmission raise standards of design and sustainable development and the need to promote a creative approach to new development around high voltage overhead lines and other NGET assets, suggesting reference is added to the policy to respecting existing site constraints including utilities to be consistent with national policy. The Royal Parks raise Richmond and Bushy Parks should be specifically referenced in the policy given their importance. St George plc and Marks and Spencer raise part B is unsound and should reference contribution to enhancing local environment and character only where appropriate. Prospect of Richmond and Old Deer Park Working Group raise there should be reference to Conservation Areas as well as the character areas and places identified in the Urban Design Study. • In relation to Designated Heritage Assets (Policy 29), Avanton Richmond Developments LTD and St George plc and Marks and Spencer raise the policy is not consistent with the NPPF in respect of where there is harm to a designated heritage asset, and how this might be outweighed by public benefits. Avanton Richmond Developments LTD also raise there should be no requirement to reinstate original features. Udney Park Playing Fields Trust urge the Council to review the draft Conservation Area Appraisal. <i>A comment in relation to the decarbonisation of existing stock including in Conservation Areas is raised on Policy 3, see Richard Mundy.</i> • In relation to Non-designated Heritage Assets (Policy 30), Avanton Richmond Developments LTD and St George plc and Marks and Spencer raise the policy is not consistent with the NPPF as there is no requirement in national legislation or policy to preserve or enhance the significance of non-designated heritage assets. Udney Park Playing Fields Trust welcome the designation of the Udney Park Pavilion as a registered War Memorial and BTM, but noting its deterioration urge the Council to use statutory enforcement powers to protect locally-listed buildings. The London Historic Parks and Gardens Trust comment it is not clear where locally listed historic parks and gardens’ have been collated and note their inventory may provide a basis. • A number of comments in regard of Views and Vistas (Policy 31) refer to comments submitted on the Draft Local Views SPD (subject to consultation in 2022): <ul style="list-style-type: none"> ○ Old Deer Park Working Group supported the continuation of adopted views and proposed new views in the SPD, but sought clarity including on the mapping and viewing locations and view management of a number of views 	<ul style="list-style-type: none"> • Policy 28 is a strategic policy which along with the Plan as a whole provides an appropriate framework for assessing local character and design quality. An additional modification to update the supporting text at paragraph 20.4 to reflect the dedicated programme for reviewing Conservation Area Appraisals has ended in 2023. <i>An additional modification could be considered to Policy 55 to reference utilities (see Policy 55).</i> • No additional modifications are considered necessary to Policy 29, which provides an appropriate framework for assessing proposals. • Policy 30 is considered to provide an appropriate framework for assessing proposals. An additional modification to correct reference to the London Historic Parks and Gardens Trust at paragraph 20.41 could be considered. • In relation to Views and Vistas (Policy 31), the Council informally considered the SPD responses and updated the Regulation 19 Plan with the list of Local Views, which reflects the draft SPD and five additional ‘new’ views proposed in response to the comments on the SPD. The Council commissioned further analysis work to review the borough’s views and vistas,

(those relevant to Old Deer Park C5.1 Twickenham Bridge (north-east); C5.2 Twickenham Bridge (south-east); C6.1 Richmond Lock & Weir; C6.2 St Margarets Riverside; C6.3 View of the Great Pagoda St Margarets; G1.1 Kings Observatory, Old Deer Park; G1.2 King's Observatory towards Kew Gardens; G1.3 Kings Observatory towards Richmond Town Centre; and G1.11 Old Deer Park Riverside). A number of new linear and landscape views were proposed – Old Deer Park views landscape, Old Deer Park linear, Twickenham Road Footbridge to St Matthias Church Spire, and Richmond Hill to King's Observatory Old Deer Park.

- Prospect of Richmond refer to the comments from Friends of Richmond Green on the SPD (see below).
- St George plc and Marks and Spencer set out Policy 31 is unsound and too prescribed, and elements do not conform with the London Plan which it should be brought into line with. Comment the Local Views SPD fails to reference national design policies and guidance and the framework for views across London, and does not provide development management guidance. Commented on the SPD supporting the principles but raising detailed points about the evidence base and that the Urban Design Study lacks crucial information, and expect a consultation on an updated draft SPD with any further details on view management and assessing the impact on views. Suggested in the SPD response proposed amendments to Policy 31 from their Regulation 18 comments. Comments on the details and lack of information on specific views: G1.14 Kew Bridge (east); G1.15 Strand on the Green; G1.16 Parish Church of St. Anne, Kew Green; H1.1 Chiswick Bridge (west); and G2.1 Victoria Gate, Kew Gardens.
- Friends of the River Crane Environment (FORCE) supported the inclusion in the SPD of A2.1 view of the Longford River, but deeply concerned that the list of local views may not be sufficient as a tool for managing views and that those not on the list have no merit or value, raising that no part of any view of any public open space along the Crane Valley enjoys any protection. Suggested views from Craneford West Field, Mereway Nature Reserve and Kneller Gardens, from Crane Park throughout its length between Meadway in the east and the A314 in the west, including the view northwest from the A316 overbridge and the view of the Shot Tower and Crane Park Island Nature Reserve, and the view from Little Park towards Pevensey.
- The Royal Parks comment on the details of mapping and viewing locations for E3.3 Sawyer's Hill and E3.5 White Lodge to Pen Ponds, and welcome the inclusion of these and other views in the SPD (A4.1 Pantile Bridge; A2.1 Dean Road footbridge; A5.8 Hampton Court Gate; A5.9 Lime Avenue; A5.10 Chestnut Avenue, northern leg; and A5.11 Water Gardens). Commented on the SPD which welcomed the SPD and the proposals for additional views to be protected and specifically inclusion of views from the Royal Parks and as managers of the Longford River. Detailed comment on the nature of the view E3.2 from King Henry's Mound in Richmond Park to Petersham Park.
- Friends of Richmond Green supported the continuation of adopted views and proposed new views in the SPD, but comment sought clarity including on the mapping and viewing locations and view management of a number of views (C5.4 Richmond Road, East Twickenham; F1.2 Richmond Green; F1.6 Asgill House; F2.1 Church of St Matthias; F1.1 Richmond Terrace, Richmond Hill; and F1.3 Richmond Bridge (north-east)). A number of new townscape, linear

alongside the Urban Design Study, as part of the comprehensive boroughwide townscape character assessment, based on their site visits as well as through desktop research, such as reviewing Conservation Area Appraisals, Registered Park & Gardens etc. to recommend whether existing views are intact and/or should be amended, and whether there are any new views that merit designation. The Council considers the policy approach is justified and does not consider any further views merit designation. There is expected to be further consideration through the Examination process, as the 'new' local views are proposed for designation as part of the plan-making process, and await the outcome of Examination before the Local Views SPD can be taken forward and finalised. No additional modifications are considered necessary to Policy 31.

- **Policy 32** is considered to provide an appropriate framework for assessing applications, although an additional modification could be considered as part of further work during the Examination process.
- **Policy 33** is considered to provide the appropriate framework to consider archaeology. *An additional modification could be considered to add to the reference in the supporting text to early involvement of GLAAS (see Places comments).*

<p>and landscape views were proposed – Richmond Little Green, Gatehouse to Old Palace Richmond Green, Old Palace Lane, Twickenham Road Footbridge to St Matthias Church Spire, Richmond Hill towards Richmond Town and from Richmond Park Pembroke Lodge towards Richmond Town.</p> <ul style="list-style-type: none"> ○ Mortlake with East Sheen Society commented the SPD is well crafted, but raised general comments seeking clarification on the adopted Policies Map, comments on the boroughwide map, and raising concern about riverside views and the relationship with Hounslow and Kingston. Noting a number of views within the historic parish, would like to see a number of additional views included – a number around the Stag Brewery site, a view along Lower Richmond Road, across Jubilee Gardens in Mortlake, along Church Path to St Mary’s Church in Mortlake, from Richmond Park to the Alton Estate, and from plateau east of White Lodge. ○ Royal Botanic Gardens Kew seek reassurance that a future version of the SPD will be available for review prior to its adoption given its importance and comments on the SPD which identified additional detail required to provide the right level of protection for the identified views. Seek clarification on the methodology relating to views analysis and view management guidance. In their SPD response, generally supportive of the SPD although suggests stronger links to the RBGK WHS Management Plan, and raised detailed comments on: G1.13 Kew Gardens and Riverside, Kew Bridge; G1.16 Kew Gardens and Riverside, Parish Church of St Anne, Kew Green; G2.2 Kew Road towards the Great Pagoda; G1.4 Pagoda Vista, Kew Gardens; G1.5 Syon Vista, Kew Gardens; G1.9 (former) St George’s Church, Old Brentford; and G2.1 Victoria Gate, Kew Gardens. ● Some support for the policy on Royal Botanic Gardens, Kew World Heritage Site (Policy 32) with detailed points on specific aspects of the policy. The GLA on behalf of Mayor of London and Historic England set out policy should reference a requirement for Heritage Impact Assessments, and Historic England wish to see reference to Outstanding Universal Value in part A. London Borough of Hounslow note ongoing engagement on cross-boundary conservation and heritage matters. Royal Botanic Gardens Kew seek a degree of balance in dealing with the management of the WHS. ● In relation to archaeology, there were no comments on Policy 33. 	
<p><i>Theme: Increasing biodiversity and the quality of our green and blue spaces, and greening the borough</i></p>	
<ul style="list-style-type: none"> ● There are some comments on the overall theme of biodiversity and blue and green infrastructure which raise support for the broad approach but also question if there should be more ambition (Claire Wilmot, Jon Rowles). The National Physical Laboratory (NPL) raise their similar work on the environment and want to hear more on the Council’s plans. The Environment Agency recommend further ways to strengthen the plan in terms of biodiversity for aquatic habitats. ● In relation to Green and Blue Infrastructure (Policy 34), Udney Park Playing Fields Trust support the recognition of Udney Park to the ecology network. London Historic Parks and Gardens Trust raise the policy should additionally seek opportunity to create new green open space. The Royal Parks welcome recognition of role of green infrastructure in reducing recreational impacts on sites such as Richmond Park, but raise specific reference to designations in the Parks should be made within the policy. 	<ul style="list-style-type: none"> ● No additional modifications are considered necessary to Policy 34 in response to comments. ● An additional modification could be considered to add a footnote to the supporting text to Policy 35 to reference 1938 Green Belt. No other additional modifications are considered necessary to Policy 35 in response to comments, as the

- In relation to **Policy 35**, some support for protection of Green Belt (CPRE London, GLA on behalf of Mayor of London), with some comments on the details of the policy approach – policy goals are not compliant with the London Plan and NPPF (CPRE London), no reference to 1938 Green Belt (Solomon Green, CPRE London), need to turn grey space into parks in areas of deficiency (CPRE London) and need for a shift to use of greener approaches to communal open space (Environment Agency). Support for the approach to Local Green Space (Udney Park Playing Fields Trust, CPRE London). The majority of comments relate to Green Belt/MOL boundaries on specific sites: **Heathfield Recreation Ground** should be added back in (CPRE London); **Hampton Water Treatment Works** should be removed from the Green Belt (Thames Water); **land adjacent to west of Sunnyside Reservoir**, Lower Hampton Road should not be in the Green Belt (David Taylor); the **eastern strip of land associated with Twickenham Stadium** should be removed from MOL (Rugby Football Union (RFU)); seek clarification whether associated ancillary facilities for outdoor sport and teaching is an appropriate use in the MOL at **Teddington Lock campus** (St Mary’s University); strip of land at **141 Uxbridge Road**, Hampton should not be in the MOL (Chantry Securities Ltd); the MOL boundary at **56 Heathside**, Whitton should be amended (Sulinder Singh); **The Boathouse**, Twickenham should be removed from MOL (The Boathouse Twickenham Ltd); should not be de-designation of MOL comprising **front gardens to Hampton Court Road** properties (CPRE London); and adjust the MOL boundary at **52 Orchard Road** (Jane Lovell). *There are comments on omission sites which relate to this policy, see Thames Water with regard to the Place-Based Strategy for Hampton & Hampton Hill for comments on Hydes Field and Land to West of Stain Hill West Reservoir, and Meliss Ave Devco Limited (in Administration) c/o RSM comment on Site Allocation 32 Kew Biothane Plant.*
 - The only comment on Other Open Land of Townscape Importance (OOLTI) (**Policy 36**) supports retention at Udney Park and states the Council should commit to enforce maintenance requirements on owners.
 - There are a number of comments on Public Open Space, Play, Sport and Recreation (**Policy 37**), with some support and some suggestions for the approach to go further. CPRE London raise the need for greater ambition in increasing the amount of green space, and the recreational pressures such as on Richmond Park. London Historic Parks and Gardens Trust raise the policy should not refer to open space/land/playing fields being surplus to requirements as it is highly unlikely in the borough and any loss should be replaced, and suggest some references should be to green open space. Sport England raise should reference instances where on-site provision is not appropriate. Mortlake with East Sheen Society raise cross-boundary movement for sports and open spaces, and that the updated Playing Pitch Strategy should be taken on board. Jon Rowles raises the Open Space evidence does not conform with Londonwide guidance and has its own classifications which are difficult to understand, and quality scores are omitted. Udney Park Playing Fields Trust raise Udney Park has the potential to be a hub site and seek opportunity to comment on a draft of the new Playing Pitch Strategy.
- policy is considered robust. Green Belt boundaries are intended to be permanent, and no weakly performing sub-areas were identified for further assessment. The MOL sites identified for removal in the Regulation 19 Plan are considered justified, and no further MOL land is proposed for release. The Open Land Review Errata Report can be updated to reference in parcel 31 The Boathouse building houses 3 dwellings.
- No additional modifications are considered necessary to **Policy 36** in response to comments.
 - **Policy 37** is considered to provide an appropriate framework to ensure adequate provision of open space and for sports. An additional modification could be considered to refer to the adopted Playing Pitch & Outdoor Sports Strategy 2023.
 - No additional modifications are considered necessary to **Policy 38** which provides an appropriate framework to provide for urban greening.
 - The Biodiversity Background Topic Paper sets the Council’s justification for the approach to seeking 20% biodiversity net gain, and no additional modifications are considered necessary in response to the comments on **Policy 39** or **Appendix 4**, except in relation to Kneller Hall as an additional modification could be considered to **Site Allocation 21** for clarity to reference the SINC designation. Further 2023

- The only comment in relation to Urban Greening (**Policy 38**) is St George plc and Marks and Spencer raising that part E should be amended as there is no evidence to justify the 70% requirement which limits space for rooftop amenity, plant/services and is too restrictive.
- There are a number of comments on Biodiversity (**Policy 39**) with comments raising the requirement for 20% biodiversity net gain above Government policy is not justified with concerns about feasibility and viability (McCarthy & Stone Retirement Lifestyles Ltd, Notting Hill Genesis, Sainsburys Supermarkets Ltd, Dukes Education Group and Radnor House School), although also a comment questioning why Kingston upon Thames has set their target at 30% (Jon Rowles). The Environment Agency would like to reference to the river metric in the supporting text of Policy 40. Support for the reference to nest boxes and bricks at paragraph 21.65. There are comments on specific nature conservation sites (also in **Appendix 4**): Thames Water object to the designation of **Hampton Water Treatment Works and Reservoirs**; Prabhat Kumar and Ham & Petersham Association & Amenities Group comment on upgrading the designation at **Ham Common** and concerns of the implications for existing informal sport and recreation uses; Dukes Education Group and Radnor House School comment on conflict with the sporting use at **Kneller Hall** as well as raising the different boundary for ownership; and The Royal Parks raise comments on **Richmond Park and Associated Areas, Bushy Park and Home Park**, and **Longford River** in Richmond.
- In relation to Rivers and River Corridors (**Policy 40**), Friends of the River Crane Environment (FORCE) raise requirements that should also apply to the River Crane, and seek clarity in policy or SPD to protect all river corridors as dark corridors. Port Hampton Estates Limited generally support the policy, but consider that it needs to address the situation where site specific conditions may preclude meeting all or some of these objectives; alternatively could be addressed in the text/policy for Platts Eyot. The Environment Agency seek stronger reference in this policy including to setback and culverted watercourse, landscaping and ecological management plans, the need to bring all waterbodies in the borough into good ecological status/potential in line with WFD requirements, and the biodiversity net gain where it will apply to the river habitat.
- In relation to Moorings and Floating Structures (**Policy 41**), Elmbridge note the Gypsy and Traveller research reference to riverboat dwellers and the ongoing Londonwide assessment and request kept formed of progress. The Environment Agency comment in relation to mudflat habitat from moorings or structures.
- In relation to Trees, Woodland and Landscape (**Policy 42**), CPRE London believe there is scope for increasing woodland cover in the borough and London Parks and Historic Gardens Trust seek additional points in the policy to assess and encourage planting.
- In relation to Floodlighting and Other External Artificial Lighting (**Policy 43**), the Environment Agency set out lighting should be informed by reference to guidance on artificial lighting by the Bat Conservation Trust, and direct overlighting of watercourse is not permitted. Sport England support the policy.

survey/reports on the Nature Conservation Sites Review (as referenced in Appendix 4) are due to be published, which confirm the existing site of borough importance at Royal Mid-Surrey Golf Course (RiB01) and the candidate sites Collis Primary School (Site 1) and York House Gardens (Site 9) as sites of local importance. Additional modifications to reflect these and other mapping updates could be considered in due course. *An additional modification could be considered to the supporting text to reference the river element of the biodiversity metric, see Policy 40.*

- **Policy 40** provides an appropriate framework to assess development adjacent to river corridors. An additional modification could be considered during the Examination to reference ecological status/potential of waterbodies. *An additional modification could be considered in relation to biodiversity, see Policy 39.*
- No additional modifications are considered necessary to **Policy 41** in response to comments.
- No additional modifications are considered necessary to **Policy 42** in response to comments.
- No additional modifications are considered necessary to **Policy 43**.

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

- In relation to Design Process (**Policy 44**), Old Deer Park Working Group and Prospect of Richmond raise the reference in part B to the design guidance for the relevant character area in the Urban Design Study should be omitted insofar as it refers to Tall and Mid-rise Building Zones for Richmond and Richmond Hill.
- There were a number of comments in relation to Tall and Mid-Rise Building Zones (**Policy 45**) in relation to particular aspects of the policy or particular sites. GLA on behalf of the Mayor of London set out the approach to tall buildings is in line with the London Plan and takes account of protected strategic views and the Kew WHS. Historic England support the policy and consider it is appropriately underpinned by evidence; raise the policy should refer to a need to ‘avoid harm’ rather than respect the views and vistas. St George plc and Marks and Spencer raise the policy wording should be less restrictive, particularly the reference to tall buildings should not exceed the appropriate height range. Reselton Properties raise the policy is too prescriptive and gives no opportunity for consideration of detailed design, and should reference proposals for tall buildings will normally only be appropriate in tall building zones. London Historic Parks and Gardens Trust raise the policy should address the visual impacts of development on open spaces. The Royal Parks raise tall buildings around the Parks can have a significant impact on their character; welcome protection of views and vistas towards heritage assets and the protection of parks. Royal Botanic Gardens Kew raise their interest in the tall and mid-rise building zones in close proximity to Kew WHS and concern the policy, supporting text and Appendix 3 do not specify the heights are a maximum in line with the London Plan. The Environment Agency raise the impact of overshadowing in relation to fish species and that an Overshadowing Assessment should be required. Avanton Richmond Developments LTD noting the approach on fire safety is broadly consistent with the GLA’s statement and supports the provision of a second staircase in buildings that meet the threshold, but raise the policy should be amended to ensure measurement is in accordance with Building Regulations. Some comments raise the quality of the mapping in Appendix 3 lacks clarity (Historic England, GLA on behalf of the Mayor). There are comments on these specific tall and mid-rise building zones (also in **Appendix 3**):
 - **Teddington (railway side)** concern it is inappropriate (Jenny & Rod Linter, *a large number of comments particularly from residents which are considered against place-based strategy for Teddington & Hampton Wick.*)
 - **LGC site** is one of the few areas in the borough that can accept change and should be assessed in more detail, with the probability of change increased to high, and given its suitability and moderate sensitivity to change has potential to be a mid-rise zone (LGC LTD).
 - **Kew Retail Park** the building height parameters are not justified by the evidence base which supports them and are unnecessarily restrictive, raising the need for a consistent approach in the assessment of sensitivity and query the probability of change, questioning the visibility and adverse impacts and seeking further testing and the policy to set a range of height (7-8 storeys) (St George plc and Marks and Spencer).
- No additional modifications are considered necessary to **Policy 44**.
- **Policy 45** is considered positively prepared and justified, based on a robust evidence base, and sets an appropriate framework to consider tall and mid-rise building zones in the borough. An additional modification could be considered to reference at part A the avoidance of harm in relation to views and vistas. An additional modification could be considered to update the supporting text to refer to the Government’s updated position on fire safety in high-rise residential buildings. An additional modification could be considered to clarify the mapping in Appendix 3, or improvements to the mapping could be considered in due course.
- No additional modifications are considered necessary to **Policy 46**.

<ul style="list-style-type: none"> ○ St Clare (Hampton Hill) Notting Hill Genesis welcome the designation. Concerns it is inappropriate, which is inconsistent with the strategy for the area and not in-keeping, and it is wrong and unjustified as the application has not yet been passed by Planning Committee (Heather Ayres, <i>a large number of comments particularly from residents which are considered against the place-based strategy for Hampton & Hampton Hill</i>). ○ Richmond Station <i>Baden Prop Limited</i> consider the tall building zone should be amended to include Westminster House, see comment against Site Allocation 25. Concern at the support for high-rise development (Prospect of Richmond, Old Deer Park Working Group, <i>Julie Scurr, The Richmond Society</i>). ○ North Sheen concern at the support for high-rise development (Prospect of Richmond, Old Deer Park Working Group). ● In relation to amenity and living conditions, there were no comments on Policy 46. 	
<p>Theme: Reducing the need to travel and improving the choices for more sustainable travel</p>	
<ul style="list-style-type: none"> ● Some comments raise general concerns about transport impacts, with the lack of a dedicated boroughwide strategic transport assessment (London Borough of Hounslow, <i>and against other parts of the Plan Transport for London (TfL), Mortlake with East Sheen Society, Councillor Niki Crookdake</i>). London Borough of Hounslow are concerned there is not information to review to assess the potential cumulative impacts of the proposed housing growth on both the road network and public transport demand locally, and with a number of large site allocations close to the shared boundary raise a holding objection until further evidence in terms of transport and highways impacts can be reviewed. The GLA on behalf of the Mayor of London set out the Sustainable Transport, Walking and Cycling London Plan Guidance should be applied to ensure that walking and cycling are supported and the Healthy Streets approach is implemented to support the target for modal shift. The Royal Parks comment in relation to the impact of traffic and associated air pollution on designated sites and priority habitats and impacts to be mitigated. ● In relation to Sustainable Travel Choices (Policy 47), there are a number of detailed comments on the overall approach and specific aspects of the policy, also with some support. National Highways raise the policy sets out the need to assess the impacts of development and consult National Highways if the proposals share a boundary with the SRN or are likely to generate a significant/severe impact on the SRN, however for Local Plan allocations expect traffic impacts and any mitigation or capacity enhancements to the SRN necessary to deliver the strategic growth should be identified as part of the plan-making process; not had sight of any traffic modelling affecting the SRN, should it affect the SRN, or any input to the IDP, and would appreciate clarification and confirmation. Transport for London (TfL) raise public transport capacity constraints may apply in higher PTALs and the wording in Part B should make it clearer there is a potential requirement for contributions in all areas regardless of PTAL, and Part C should refer to implementing measures identified through an Active Travel Zone (ATZ) Assessment. Network Rail raise the policy should be broadened to include improving access to rail stations where new developments are in close proximity, and agree with appropriate safeguarding of land which should be based on existing and future operational requirements. Jon Rowles 	<ul style="list-style-type: none"> ● See the Statements of Common Ground with a number of the Duty to Cooperate bodies, which include reference to the Transport Background Topic Paper drawing together information on transport impacts. ● Policy 47 is considered to provide an appropriate strategic policy framework for increasing active travel and assessing the impact of proposed developments, and no additional modifications are considered necessary. ● An additional modification could be considered to Policy 48 to reference the Council’s updated highway authority requirements for vehicle crossover application criteria, but the policy is otherwise considered to provide an appropriate framework to assess site-specific parking including provision for car-clubs and disabled parking.

<p>raises opportunity areas in Hounslow and Kingston will result in more traffic in Richmond and impacts include provision for cyclists. Surrey County Council consider any impacts on Surrey’s transport network would need to be assessed and any appropriate mitigation measures identified and funded. Elmbridge Borough Council note the strategic transport modelling for the London Plan but consider there should be an up to date assessment of any potential cross boundary or cumulative impacts on the road network outside of the borough, and welcome future engagement on this issue. Mortlake with East Sheen Society note the evidence base does not include any borough-based transport studies and that there is no detail on TfL carrying out an assessment of orbital journeys, and raising concern about the lack of improvements around Mortlake Station and why improvements at stations affected by development are not funded. Councillor Niki Crookdake raises concern about the impact of extensive development in the east of the borough, in the context of existing constraints and congestion, with unprecedented growth planned on a number of site allocations that will create a significant burden on transport infrastructure; consider the evidence base taken from the Local Implementation Plan is out of date and has been raising concerns over the lack of evidence that the cumulative impact has been considered including with neighbouring boroughs, and there is a lack of transport infrastructure improvements and developer mitigation identified. National Highways also raise that they cannot be a party to Section 106 contributions and funding for infrastructure or mitigation cannot be assumed. Elena Mikhaylova raises concern the policy limiting use of cars breaches human rights and the Equality and Disabilities Act.</p> <ul style="list-style-type: none"> • In relation to Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management (Policy 48), CPRE London raise car free development and that the site allocations should not specify minimum levels of car parking, and the vehicle crossovers policy should be extended to promote the reinstatement of front gardens and ensure priority to bus and cycle lanes and safe pavements. Transport for London (TfL) raise: a Parking Design & Management Plan should be required as guidance is due to be issued; car club spaces may not be appropriate in areas of high PTAL; there may be a need to consider on-street disabled parking on constrained sites. McCarthy & Stone Retirement Lifestyles Ltd raise older persons housing schemes should be exempt from providing car free developments. 	
<p>Theme: Securing new social and community infrastructure to support a growing population</p>	
<ul style="list-style-type: none"> • Some general support for the policy approach to social and community infrastructure (Policy 49). Sport England state sport and recreation facilities should be excluded from the marketing requirements in Appendix 2. Udney Park Playing Fields Trust state the supporting text reference to Assets of Community Value should explicitly say this status is a material consideration. <i>There are comments on specific sites which refer to Policy 49, see West London NHS Trust on Site Allocation 24 Cassel Hospital and Whitton Community Association on Site Allocation 22 Whitton Community Centre.</i> • Education provision (Policy 50) raised in terms of identifying sites/admission priority (CPRE London) including for the Stag Brewery particularly in light of cross-boundary school place planning (Councillor Niki Crookdake). The Local Employment Agreement requirements should be strengthened to cover the Council, to apply to a lower threshold of 10 units and should only be avoided in exceptional circumstances. 	<ul style="list-style-type: none"> • No additional modifications are considered necessary to Policy 49 in response to comments, as it provides a framework to assess a range of social and community infrastructure proposals on a site-specific basis. An additional modification could be considered to update the supporting text to reference the Indoor Sports Needs

	<p>Assessment is now expected in 2024 (see <i>General/Intro comments</i>).</p> <ul style="list-style-type: none"> • No additional modifications are considered necessary to Policy 50 in response to comments, as the Plan identifies sites to meet future educational needs in line with the latest School Place Planning Strategy, and seeks Local Employment Agreements from sites where there is scope to provide a significant contribution on site to employment and training opportunities in the borough.
<p><i>Theme: Creating safe, healthy and inclusive communities</i></p>	
<ul style="list-style-type: none"> • In relation to Health and Wellbeing (Policy 51), Sport England support the policy and recommend reference to their Active Design guidance in the supporting text. Solomon Green raises the lack of A&E facilities within the borough and the difficulties in accessing for residents and emergency services. • In relation to Allotments and Food Growing Spaces (Policy 52), CPRE London raise the allotments not designated as statutory should be upgraded to such, and that there are waiting lists, with subdivided plots too small for crop rotation. • In relation to Local Environmental Impacts (Policy 53), Thames Water raise the Plan should consider the impact of any development within 800m of a sewage works and 15m of a pumping station and whether an odour impact assessment is required. National Physical Laboratory (NPL) offer input into ensuring air quality targets are achieved. The Environment Agency acknowledge part M of the policy deals with land contamination, but raise that part I should reference specific requirements for waste sites. • In relation to Basements and Subterranean Developments, there were no comments on Policy 54. 	<ul style="list-style-type: none"> • No additional modifications are considered necessary to Policy 51 in response to comments, although an additional modification could be considered to update the latest HIA template to use. • No additional modifications are considered necessary to Policy 52. • No additional modifications are considered necessary to Policy 53. • No additional modifications are considered necessary to Policy 54.
<p><i>Implementation, Delivery and Monitoring</i></p>	
<ul style="list-style-type: none"> • In relation to Delivery and Monitoring (Policy 55), HUDU in consultation with South West London Integrated Care Board seek a reference to health or social infrastructure should be included in the policy, and The Royal Parks raise it is important some of the value of development helps to support the maintenance, management and protection of the Parks. A number of comments relate to implementation, monitoring and enforcement - Jon Rowles raises monitoring is unclear, Udney Park Playing Fields Trust raise there should be a commitment to enforcement beyond unauthorised development, and Julie Scurr questions delivery. The Richmond Society raise it is not clear how implementation will apply to existing stock, while National Physical Laboratory (NPL) offer expertise and guidance to meet the net zero carbon target. A number of comments relate to particular aspects of infrastructure, with HUDU in consultation with 	<ul style="list-style-type: none"> • Policy 55 is considered to provide an appropriate framework for delivery and monitoring, allowing for site-specific assessments of proposals to ensure planning obligations contribute to mitigating the impacts of new development. <i>An additional modification to the supporting text to Policy 55 Delivery & Monitoring could be</i>

South West London Integrated Care Board to comment separately on the IDP and future Infrastructure Delivery Schedule, and National Highways expect any mitigation measures to be identified in the IDP which could include those related to road safety, congestion, sustainable transport or physical highways improvements and would like to be kept informed of its review. Jon Rowles comments the IDP looks like a draft document with estimated costs missing.

considered to reference the constraints of existing utilities, see Policy 28. An update to the IDP, including details on costs, and the Monitoring Framework are submission documents.

Summary of each comment on the Publication Local Plan (Regulation 19) consultation (in plan order)

Who said it/ Representation No.	Summary of response
General	
Elena Mikhaylova , 1	Not acceptable to develop the plan using taxpayers' money with no initial consolation. Submitted an FOI response to request how much money was spent on it and what organisations benefitted, with a next step to further investigate whether public funds have been embezzled. The consultation period is too short and local communities are not appropriately notified. Therefore the representation of people commenting is not significant.
Julie Scurr , 2	Overall the whole plan is depressing, as it unimaginatively concentrates on building as many housing units as possible in every space available in the borough usually with height which should not be considered without increased policing. Limited mention to public realm, usually a small square which will fall into disrepair. It will turn the borough into an urban rather than suburban area.
Mary Stone , 3	In favour of the plan and want that to be recorded, but found it difficult to respond.
Solomon Green , 4	Congratulate the team on producing a readable and comprehensive documents, comments made for other sections.
Michael Atkins, Port of London Authority (PLA) , 5	Thank you for consulting the Port of London Authority (PLA), it has been reviewed with no further comments. Welcome amendments to policies 38, 40 and 41 in line with comments raised at regulation 18, therefore the PLA considers it to be sound.
Mike Corbett, Runnymede Borough Council , 6	Thank you for consulting Runnymede Borough Council. We have no comments to make on the Publication Local Plan.
Hannah Harris, Royal Borough of Kingston upon Thames , 7	Thank you for the opportunity to submit comments to the Regulation 19 plan. The RBKuT does not wish to comment on the soundness of the plan. Both Council's have cooperated on cross boundary matters and this cooperative working is welcomed going forward.
Hannah Bridges, Spelthorne Borough Council , 8	Thank you for consulting Spelthorne Borough Council. We have collaborated on cross boundary matters including flood risk, housing and green belt and we look forward to continued joint working.
Tim Brennan, Historic England , 9	Thank you for the opportunity to comment on the consultation document as well as our recent meeting to discuss certain areas of the emerging Plan. Comments are made in context of the NPPF and PPG throughout and cover predominately the conservation and enhancement of the historic environment. They are designed to ensure the plan is justified, effective and sound.
Sammantha Rose, National Highways , 10	National Highways welcomes the opportunity to provide our comments on the Local Plan Publication (Regulation 19) version. Interested in traffic impacts of development site proposals or policies as statutory consultees. Agree with the themes and objectives of the plan including reducing the need to travel and improving sustainable travel choice. In terms of the Strategic Road Network development proposals would be unacceptable with road safety or severe congestion impacts. May be a requirement for physical highway network improvements if the assessment of transport implications of the plan show unacceptable impacts.
Richard Carr, Transport for London (TfL) , 11	Thank you for giving Transport for London (TfL) the opportunity to comment on Richmond's draft local plan. Pleased that points from Regulation 18 were included. Welcome strong aspirations to implement the 20-minute neighbourhood and the recognition of the importance of active travel and public transport. It would be helpful if reference to the ambition for road safety is included as a planning issue in development proposals. The car parking standards for car free development is not always reflected in site allocations, despite the overall stance. Welcome the approach of the draft background paper for transport and look forward to reviewing it and continued close working.

Molly Dadswell, Natural England , 12	Thank you for the consultation, Natural England are content the Local Plan will not have an adverse impact on the natural environment or designated sites.
James Stevens, Home Builders Federation , 13	Thank you for consulting upon the new Richmond-upon-Thames Local Plan, Regulation 19 consultation version. Submitted the following representations and register interest in being involved in subsequent examination of the Local Plan.
Mark Jopling, Udney Park Playing Fields Trust , 14	The Udney Park Playing Fields Trust welcomes the continued planning protections in the draft Local Plan for Udney Park as a Local Green Space, Other Open Land of Townscape Importance and Asset of Community Value.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 15	Responses made at regulation 18 still stand with a full response to the draft plan attached. Disappointed by the Council's failure to respond positively to Regulation 18 responses.
Katherine Drew, The Royal Parks , 16	Grateful if comments from regulation 18 are considered again, in particular a standalone Royal Parks Policy. Urge that 2023 versions of the Urban Design Study and Metropolitan Open Land Report should be considered in detail by the inspector.
Suzanne Parkes, Elmbridge Borough Council , 17	Thank you for consulting Elmbridge Borough Council (EBC) on your Publication Local Plan as a neighbouring authority EBC is keen to continue working closely with LBRuT. Commented on policies that have cross-boundary implications and subject to ongoing collaboration under the Duty to Cooperate. EBC confirm that our authorities have engaged on strategic matters throughout the preparation of our respective plans.
Suzanne Parkes, Elmbridge Borough Council , 18	Committed to working positively together and welcomes ongoing collaboration for our respective plans towards submission and examination.
Jonathan Blathwayt, GLA on behalf of Mayor of London , 19	Thank you for consulting the Mayor of London on the Richmond Local Plan. Response sets out amendments in line with the London Plan and the plan is in general conformity with the London Plan. Policy 11 on affordable housing is not in general conformity with Policy H4 potentially resulting in fewer affordable homes being delivered.
Duncan McKane, London Borough of Hounslow , 20	Thank you for consulting LBH on the Local Plan Regulation 19. LBH is broadly supportive of the strategy particularly living locally but raises an objection pending further information on transport and highways impact. Welcome the opportunity to engage further through continued duty to cooperate.
Peter Willan and Paul Velluet, Old Deer Park Working Group , 21	Attached a full response, response remains unchanged for Regulation 18. Concerned by council's failure to positively respond to these representations. 2023 versions of the UDS and MOL Annex should be considered in detail by the inspector.
Henry Brown (The Planning Lab), Royal Botanic Gardens Kew , 22	Responses reflect those made at regulation 18 and RBGK remain broadly supportive of the strategic vision. Summary of concerns: designation of Kew Gardens as an "incremental intensification area" and "an area deficient in public open space"; clarification of how policy 31 views have been assessed; amendments to policy 31 to ensure balance between protecting RBGK WHS with regard to future development.; and inconsistency with permitted heights in policy 45.
Summer Wong (RPS), Notting Hill Genesis , 23	Current application for redevelopment of St Clare Business Park. Set out below comments in regard to Policy 4, 6, 10, 11, 21, 24, 25, 39 and 45.
Tim Catchpole, Mortlake with East Sheen Society , 24	No problems with Duty to Cooperate Compliance and impressed with work on this throughout. In regard to Soundness our comments are as follows: <ul style="list-style-type: none"> Positively Prepared: agree with strategy but would expect it to lead directly to policies and planning guidelines, however the strategy instead leads to local strategies. We leave it with the inspector to decide if this break in tradition is acceptable.

	<ul style="list-style-type: none"> • Justified: strategy is appropriate, but concerned about one aspect around the cumulative impact of development described in site allocations. Traffic modelling evidence is not proportionate and public transport alternative for orbital movement are inadequate. • Effective: plan is deliverable but concerns about cross boundary joint working particularly in maps. • Consistent with national policy: some planning applications do not accord with policies and approved on benefit outweighs harm, notably the Homebase site and Stag Brewery Development.
Rachel Holmes, Environment Agency, 25	Detailed comments provided with several policies we consider to be unsound.
Councillor Niki Crookdake , Green Party Councillor for Mortlake & Barnes Common, 26	Detailed comments provided with explanations and reference to NPPF, London Plan and other Local Plan Policies. The comments are connected as they arise from an unwillingness from the administration to engage around unprecedented development in the East of the Borough. I would like the inspector to consider if: the current transport strategy should be reviewed; conflict of interest in section 17 is consistent with national policy; the amendments to the Education and Training Policy are consistent with National Policy; and Chertsey Court should be included as a site allocation because the rejection of the site was not justified.
Martha Bailey, London Historic Parks and Gardens Trust, 27	Ask local authorities to include protection for local green and open spaces as heritage assets in policies. LPG hopes its inventory is used to inform supplementary planning documentation in the future.
Jon Rowles, 28	Concerns around not following the SCI, an easy to digest summary consultation documents was produce for direction of travel stage but not reg 18 or 19. There doesn't appear to be any outreach work done for hard to read groups such as LGBT+ and ethnic minorities, therefore another round of consultation workshops is needed with these groups. Some reports added to the evidence base very late in the consultation and not made people aware they can comment on them, therefore another round of consultation is needed. The online policies map only went live in the last 2 weeks of consultation. The 2023 Local Government Association Corporate Peer Challenge Report found that the council focused too much on Richmond and Twickenham and failed to plan for the needs or less vocal communities.
Peter Willan and Paul Velluet, Old Deer Park Working Group, 29	Disappointed with Council's failure to respond positively to our regulation 18 representations.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 30	Disappointed with Council's failure to respond positively to our regulation 18 representations.
Introduction	
Katherine Drew, The Royal Parks, 31	Grateful if comments from regulation 18 are considered again.
James Stevens, Home Builders Federation, 32	It would be helpful if the plan period (15 years) will be clarified and stated on the cover. Assuming adoption will be some point in 2025, will it be 2025-2040.

Joe Cunnane (Cunnane Town Planning), Hampton Hill Residents , 33	Reference should be made to the Localism Act 2011 to make it compliant with the Localism Act 2011. There is duty to take account of responses to consultation.
John Webb , 34	Reference should be made to the Localism Act 2011 to make it compliant with the Localism Act 2011. There is duty to take account of responses to consultation.
Jon Rowles , 35	The council plans to retire the Twickenham Area Action Plan, without a village planning SPD therefore central Twickenham will have fewer protections than the rest of the borough. The council should commission a village planning SPD for central Twickenham.
Zoe Chick, River Thames Scheme , 36	The RTS requests that the proposed upgrades to Molesey Weir and Teddington Weir which are located within the LBRuT are presented on your Policies map, alongside strengthened policies. We will share a shapefile so this can be added.
Rachel Holmes, Environment Agency , 37	Welcome amendments to the summary section to reference natural environmental features as raised at regulation 18. The nature of the Sustainability Appraisal means the assessment of policies is broad. Agree that with flood risk it is difficult to identify specific effects without detailed information on the proposal. The SFRA contains appropriate recommendations for development to minimise flood risk.
Max Lankester, Friends of Richmond Park , 38	Habitats regulation assessment: roads in Richmond Park, despite not being the primary road network, are susceptible to traffic resulting from development. The assumption that only the primary road network is affected by development traffic has no justification. The relevant Crown Roads should be included.
Jo Edwards, Sport England , 39	Request details of the timetable of work for updating the Indoor Sports Facility evidence base.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 40	Disappointed with Council's failure to respond positively to our regulation 18 representations in relation to the evidence base – the Urban Design Study and the MOL Review.
Peter Willan and Paul Velluet, Old Deer Park Working Group , 41	Disappointed with Council's failure to respond positively to our regulation 18 representations in relation to the evidence base – the Urban Design Study and the MOL Review.
Claire Wilmot , 42	Para 2.31: Mixed use development should be utilised more frequently to ensure that energy is efficiently utilised.
Rachel Holmes, Environment Agency , 43	Introduction chapter 'responding to a changing environment': recommendation from regulation 18 to reference the Thames Estuary 2100 Plan earlier potentially in this section not taken forward. However we are satisfied with the reasoning in the statement of consultation to reference it elsewhere.
Claire Wilmot , 44	Para 2.35: Heat Pumps are difficult in an area such as this as efficiency isn't validate yet, more encouragement for external and internal insulation, use of water butts and grey water usage should be considered.
Claire Wilmot , 45	Para 2.37: this is critical to encourage exercise for long-term benefits. The number of residents embracing wild swimming is proof of embracing the local area in new ways.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 46	Para 2.44 and 2.45: Disappointed with Council's failure to respond positively to our regulation 18 representations in relation to Heathrow.

Peter Willan and Paul Velluet, Old Deer Park Working Group , 47	Para 2.44 and 2.45: Disappointed with Council's failure to respond positively to our regulation 18 representations in relation to Heathrow.
Claire Wilmot, 48	Para 2.43: Heathrow stated they have reduced their noise pollution since 2006, which is a lie. The flights are encouraged to fly on closer paths in more defined routes, whereas other airports make compulsory steeper take-offs or do not allow late take-offs.
Claire Wilmot, 49	Para 2.44: support this stance.
Vision and Strategic Objectives	
Luke Burroughs, Transport Trading Limited Properties Limited (TTLP) , 50	Thank you for providing the opportunity to comment on the Regulation 18 plan. TTLP broadly supports the strategic vision and are particularly supportive of the objective to meet London Plan housing targets and to maximise affordable housing alongside the commitment to a pathway for zero carbon development.
Rachel Holmes, Environment Agency , 51	Welcome that in line with our Regulation 18 response that: reducing flood risk has been incorporated into the strategic vision; flood storage is referenced in the strategic objectives; and reference to buildings being resilient to climate change in the strategic objectives. The second bullet point under the responding to climate change strategic objective should consider using Nature Flood Management techniques where possible in line with the Water Framework Directive requirements.
Louise Fluker, The Richmond Society , 52	Para 3.2: Vision refers to 20 minute communities, however there is a significant difference between distance travelled for pedestrians or cyclists. This should be clearer on what is meant, this is significant due to the ageing population, clarify 20 minutes by walking or cycling.
Louise Fluker, The Richmond Society , 53	Para 3.3: include wording for those with mobility issues in reference to improving connectivity and accessibility to consider the ageing population
Policy 1. Living Locally and the 20-minute neighbourhood (Strategic Policy)	
Gary Hageen, 54 & 67	Concerned that the 20-minute should have its own full, dedicated consultation due to the extent of its impact and that the policy has not been widely publicised.
Jonathan Blathwayt, GLA on behalf of Mayor of London , 55	Supports the "live locally" objective as it fits with the Good Growth objectives set out in the London Plan 2021. Welcomes the overarching spatial strategy to focus development around the existing town centres in the Borough.
Louise Fluker, The Richmond Society , 56 & 68	The draft Plan ignores the needs of residents or visitors who are not mobile. Concerned that someone in a wheelchair cannot cycle or walk and using public transport can be difficult and that there is no acknowledgement that some people might need to travel via cars. Suggests text be added to read "...reducing dependency on car use except for those who have mobility issues".
Julie Scurr, 57	To increase the number of trips made by bicycle, consideration must be given to increasing the amount of safe cycle routes across the whole Borough and most importantly, safe cycle parking. Highlights that they would cycle to Richmond, but have concerns that their bike could be stolen. Also highlights the impracticalities of carrying heavy locks around.
John Sadler, CPRE London , 58	Believes the policy should be re-defined as meaning 10-minutes walk to and 10-minutes walk from. Thinks that more needs to be set out in terms of what services are needed to set up genuine twenty-minute neighbourhoods. Also thinks that more is needed on how to link walking/cycling with the rail/tube network, such as secure cycle parking by stations. Highlights that opportunities that low traffic neighbourhoods create in terms of promoting the visitor economy and reclaiming 'grey space' and reallocate it for active travel and green infrastructure.

	Wants to see greater a greater link between reducing car use and spatial planning, such as removing carparks, introducing low traffic neighbourhoods and closing Richmond Bridge.
Olivia Russell (CBRE), Rugby Football Union (RFU) , 59	Highlights they have previously expressed support for the ‘living locally’ approach in terms of accessing essential services, reducing urban carbon emissions and biodiversity loss, but raised concerns about the potential for this policy to limit movement and restrict visitor journeys to Twickenham Stadium. Notes and welcomes the additional supporting text that details the expectations for how applications will demonstrate compliance with the policy. Also notes and welcomes that the Regulation 19 Local Plan includes an information note, confirming this policy is not seeking to restrict journeys. States that the ambitions of the RFU accord with this policy, including encouraging cycling and the use of sustainable transport modes through transport improvements, prioritising access and inclusivity, facilitating a thriving local economy and creating high quality green infrastructure and public realm.
Martha Bailey, London Historic Parks and Gardens Trust , 60	Considers the addition of a further point (after Part C, Point 2) to read “protect and enhance existing open space in the borough”, necessary.
Phillip Villars, PMV Planning Limited on behalf of owner of Arlington Works , 61	Highlights that the Arlington Works site is within close proximity to the centre of St Margarets and has the potential to positively contribute towards the 20-minute neighbourhood of St Margarets.
Craig Hatton, Network Rail (Southern) , 62	Supports the strategy to encourage 20-minute neighbourhoods and for people to use public transport. Notes that Point 2 of the Policy indicates a desire to improve access to public transport and for those with mobility issues. Supports this, but doesn’t believe the Plan goes far enough in addressing these matters fully. Sets out that there are twelve mainline rail stations across the Borough and that Network Rail think the Plan could better support the rail network, to reflect the aspirations of Policy 1.
Jo Edwards, Sport England , 63	Supports this policy and highlights that it is consistent with Sport England’s Active Design Guidance.
Suzanne Parkes, Elmbridge Borough Council , 64	Supports this policy, sets out that the strategic objectives reflect Elmbridge’s guiding principles set out in its Draft Local Plan (June 2022).
Jon Rowles , 65	Disappointed that the Council is not adopting the standard definition of a twenty-minute neighbourhood. Needs to take into consideration the needs of the less physically mobile, while ensuring that disabled people and the elderly are not disadvantaged.
Elena Mikhaylova , 66	Concerned that this policy places restrictions to residents’ freedom of movement. Feels that this policy is a direct breach of Human freedoms and should be cancelled immediately.
Policy 2. Spatial Strategy: Managing change in the borough	
Henry Brown (The Planning Lab), Royal Botanic Gardens Kew , 69	Raises that the ‘Key Diagram’ on page 26 of the Plan designates a large proportion of Kew Gardens as an “incremental intensification area” and an “area deficient in public open space”. Believe this is at odds with the character and nature of the locality. Concerned that the inclusion of Kew Gardens and the surrounding streets could lead to an intensification of development which would harm the heritage value. Also concerned that this approach is not compliant with London Plan Policy HC1. Feel that the designations mentioned above contradict the Urban Design Study (2023) undertaken by Arup which sets out that Kew Gardens and Riverside has a high sensitivity to change, and that the area’s high value and susceptibility mean that significant change is unlikely to be appropriate. Request that both eh designations mentioned above are reassessed or their application to the immediate area surrounding the Gardens be clarified in the policy text.

Zoe Chick, River Thames Scheme, 70	Supports this policy, particularly Part C.
Tim Catchpole, Mortlake with East Sheen Society, 71	Query why the spatial strategies for the nine distinct areas of the borough appear at the start of the document rather than at the end. Raises that previous Local Plans have started with the strategic policies and then moved to the development sites at the end. Believe that local spatial strategies should come after the strategic policies and before the development sites. Not convinced that the boundaries of the nine distinct areas are reflective of how residents feel.
Peter Willan and Paul Velluet, Old Deer Park Working Group, 72	Disappointed that the Council have failed to respond to previous representations, therefore maintain their objection. Concerned that the Plan is based on population growing only slightly. Believe it's important to emphasis improvement as well as growth.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 73	Disappointed that the Council have failed to respond to previous representations, therefore maintain their objection. Concerned that the Plan is based on population growing only slightly. Believe it's important to emphasis improvements as well as growth.
Suzanne Parkes, Elmbridge Borough Council, 64	Supports this policy, sets out that the strategic objectives reflect Elmbridge's guiding principles set out in its Draft Local Plan (June 2022).
Places	
James Sheppard (CBRE), LGC LTD, 74	Promotes and supports a mixed-use site allocation for LGC site to provide local jobs, employment and homes. The site could be used to deliver affordable housing and high quality public realm. The plan is unsound and not legally compliant for the above reasons.
Philip Villars, PMV Planning Limited on behalf of owner of Arlington Works, 75	The Arlington works site should be allocated for mixed-use development to meet housing and employment space needs, including affordable housing provision.
Councillor Niki Crookdake , Green Party Councillor for Mortlake & Barnes Common, 76	Inclusion of Chertsey Court as a site allocation or within the existing Stag Brewery allocation. The rejection of this site is not justified under NPPF policy 35b.
John Sadler, CPRE London, 77	Remove Richmond Waitrose, Paradise Road Multi-storey, West Sheen Waitrose and Teddington Tesco car parks to replace with mixed-use development.
Jon Rowles, 78	Amend the place strategy to ensure places and towns are not too big and encourage each are to have a neighbourhood plan to bring decision-making close to loc-al communities.
Richard Carr, Transport for London (TfL), 79	State the PTAL as a numeric score as opposed to subjective gradings i.e poor, as the London plan no longer uses subjective grading.
Tim Brennan, Historic England, 80	Welcome the greater level of detail in relation to context of site allocations and the identification of heritage assets and reference to evidence and guidance. However, for a limited number of sensitive allocations there remains further work to ensure heritage significance is reflected and enhanced. Historic England's advice note for understanding heritage significance and the sites contribution is an important starting point.

	Further amendments are necessary as set out in allocation policies to make clear how development can manage heritage impacts. This could draw on heritage assessments and will strengthen the link to the evidence base. Comment on three site allocations where this applies given heritage sensitivities. Also recommend inclusion of further text to ensure GLAAS consulted early with regard to place making and public benefit opportunities, and note they are in Archaeological Priority Areas rather than zones.
Anna Stott (WSP), Sainsburys Supermarkets Ltd, 81	Comments made at reg 18 for Sainsburys site allocations have not been addressed, therefore the plan is unsound.
Duncan McKane, London Borough of Hounslow, 82	LBH request that if development comes forward for site allocations 4, 18, 21, 31 and 35 that LBRuT engages with their DM officers to address cross-boundary impacts.
David Wilson, Thames Water, 83	See detailed comments on specific sites on assessments for water supply, sewerage and wastewater treatment. Early engagement between developers and Thames Water is encouraged and would be beneficial for sites to understand drainage requirements and water supply requirements.
Place-based Strategy for Hampton & Hampton Hill	
Katherine Drew, The Royal Parks, 84	Incorporate comments from regulation 18 where not included in regulation 19 version of the plan.
David Wilson, Thames Water, 85	Remove the land to west of stain hill west reservoir, Hampton Water Treatments Works site from the green belt and allocate for residential development.
David Wilson, Thames Water, 86	Remove the Hydes Field, land north of Hampton Water Treatment Works site from the green belt and allocate as a future infrastructure development site, with a use for water or wastewater infrastructure provisions.
Gary Hagreen, 87	Remove the St Clare site from the mid rise building zones due to the height not being appropriate to this site with large local opposition.
Alison Barker, 88	Remove the notion of 5 storeys being appropriate for St Clare as it would dwarf the surrounding area.
Heather Ayres, 89	Unjustified St Clare mid-rise zone as it goes against the residents who oppose the height of 5 storeys.
Katie Sullivan, 90	Wrong and unjust to include St Clare midrise zone because is contrary to the views of local residents and does not conserve or enhance the area, as described in the Local Plan.
Jane Marwood, 91	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Greg Palmer, 92	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Christine Palmer, 93	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Roger Hitchman, 94	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Martha Robinson, 95	Appendix 3 St Clare mid-rise zone map contradicts the strategy for Hampton Hill by stating it is an area sensitive to change owing to the consistent building heights.
Ian Donald, 96	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.

Janet Williams , 97	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Robert Harvey , 98	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Ben Moxon , 99	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Audrey Donald , 100	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Anne Chatterton , 101	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Anthony Reed , 102	Appendix 3 St Clare mid-rise zone map contradicts the strategy for Hampton Hill by stating it is an area sensitive to change owing to the consistent building heights. Delete the map at appendix 3.
Linda Brignall, Hampton Hill Association , 103	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Amanda Ribbans , 104	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Denise Donald , 105	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Georgia Ballantine, Hampton Hill Business Association , 106	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys. St Clare is currently a commercial site so would need to be classed as a residential site.
John Webb , 107	Make the plan consistent and remove St Clare mid-rise zone.
Tina Moxon , 108	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Jim Simler , 109	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Richard Moody , 110	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Paul Stancer , 111	The St Clare mid-rise zone may cause parking and traffic issues for current residents. The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy.
Robert Kemp , 112	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Trevor Staplehurst , 113	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy, it needs to be revised to 2-3 storeys.
Douglas Urquhart , 114	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.

Catherine James , 115	In line with the Localism Act 2011 take into account residents concerns and make the plan consistent by removing the St Clare mid-rise building zone due to its high sensitivity to change.
Sarah Hitchman , 116	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Theodorus Janssen , 117	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Bettina Rix , 118	Object that St Clare is suitable for 5 storeys due to the existing residential 2 storey terraces.
Joe Cunnane (Cunnane Town Planning), Hampton Hill Residents , 119	Make the plan consistent and remove the St Clare mid-rise zone. The criteria for mid and tall buildings has not been applied.
Site Allocation 1: Hampton Square, Hampton	
Richard Carr, Transport for London (TfL) , 120	Remove the word retain and replace with minimise to be in line with London Plan policy on parking.
David Wilson, Thames Water , 121	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so waste needs of proposed development can be assessed.
Site Allocation 2: Platts Eyot, Hampton	
Kay Collins (Solve Planning), Port Hampton Estates Limited , 122	Existing land use should include a residential use cottage. Planning history should reflect discussions with the landowner to respect the unique character and protect listed building. Very limited vehicular access could be changed to improved vehicular access would be needed for development.
David Wilson, Thames Water , 123	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so waste needs of proposed development can be assessed.
Rachel Holmes, Environment Agency , 124	Welcome comments from reg 18 being included. Note that the EA is not responsible for safe access, as mentioned in the site allocation. But the EA would welcome being reference in association with the works for flood zone designation.
Suzanne Parkes, Elmbridge Borough Council , 125	Important features are recognised in the place-based strategy. This site sits on our shared boundary and EBC welcomes that proposed schemes would ensure safe access, however an indicative level of development in terms of employment and residential would be useful. EBC would like to be engaged with the future preparation of this site.
Site Allocation 3: Hampton Traffic Unit, 60-68 Station Road, Hampton	
David Wilson, Thames Water , 126	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for waste infrastructure. Other: brownfield development may be near to sewers, so applicants should follow Thames Water advise for working near pipes.
Site Allocation 4: Car Park for Sainsburys, Uxbridge Road, Hampton	
David Wilson, Thames Water , 127	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so waste needs of proposed development can be assessed.
Richard Carr, Transport for London (TfL) , 128	Welcome that bus stop S should be retained. To be consistent with London Plan Policy T6 amend wording to change 'to London Plan standards' to 'in line with'. Welcome the requirement for charging hubs and hydrogen fuel facilities.

Anna Stott (WSP), Sainsburys Supermarkets Ltd , 129	Reconsider the reference to 100% affordable housing to those in draft policy 11. The tenure of residential units does not justify MOL removal, but instead the strong evidence base in the MOL review report does. The designation as MOL is a historic oversight and should be rectified. Also require 10% BNG as opposed to 20% in line with the Environment Act. These changes will ensure viability of future development.
John Sadler, CPRE London, 130	The site should be mixed-use development with no surface level parking, as that is an inefficient use of space.
Site Allocation 5: Hampton Telephone Exchange (Molesey Telephone Exchange), 34 High Street, Hampton, TW12 2SJ	
David Wilson, Thames Water , 131	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so wastewater needs of proposed development can be assessed.
Place-based Strategy for Teddington & Hampton Wick	
Peter Thompson, National Physical Laboratory (NPL) , 132	The vision for Teddington is important to NPL and NPL are keen to work alongside the council to recruit and retain employees to positively impact the area. The inclusion of Policy 11 affordable housing and Policy 17 and 21 is welcomed, due to the challenge of high cost of housing in Richmond. It would be helpful to include more travel plans within the borough for commuters, as Teddington is difficult to access via public transport from the southeast/west. The NPL thanks the council for recognising it as a significant asset and as a nationally important scientific institution.
Katherine Drew, The Royal Parks , 133	Would be grateful for any comments made at Regulation 18 to be included in relation to protection of open spaces.
Graeme Fraser-Watson, 134	Pleased with the recognition of Teddington's uniform street patterns, green infrastructure and overall character, however objects to the designation of a mid-rise zone in Teddington. This designation is inappropriate and should be removed. The designation of Teddington Business Park as a Locally Significant Industrial Site is supported to protect employment.
Howard Dix, 135	The identified opportunity for mid-rise buildings is not supported. The area is unsuitable for mid-rise buildings, and existing buildings of height should not set a precedent.
John Danby, 136	Teddington Station mid-rise zone should be removed, as Teddington is primarily low-rise contributing to the townscape character. The LSIS allocation is contradicted by the mid-rise zone that may lead to development.
Claudette Eldridge, 137	Buildings by Teddington bridge should never be considered.
Jo Gourlay, 138	Concerned about the mid-rise buildings damaging Teddington's unique character.
Hannah Mackenzie, 139	Concerned about the area north of Teddington station being designated as a mid-rise zone as this would change the character of the town. All applications should instead be considered on its merits.
Hardy Giesler, 140	Objecting to the place-based strategy and mid-rise building zone, as Teddington is mentioned as having a high sensitivity to change. Therefore, the mid-rise zone is surprising in a predominately mid-rise area. The Travelodge should not set a precedent.
Jennifer Kelly, 141	Concerned about the Teddington mid-rise zone, as there is no need or reason to have this height of development in that area. However, higher development is fine on the North side of the road and to the west of the railway line, but not the south.
Nuala Orton, 142	All residents should be consulted on the mid-rise zone.
Anthony Kearney, 143	Reflect the concerns of the Teddington Society with disapproval for the Teddington mid-rise zone, on the basis of it changing the character of the town. The loss of industrial buildings to residential is concerning.
Alison Campbell, 144	Concerned with mid-rise buildings, the occasional mid-rise building along Park Road or Station Road may be appropriate but not long rows. Also concerned with the loss of industrial estate on station road.
Rosemary Perry, 145	There is no need for further mid-rise buildings, as existing large buildings have already damaged the character.

, 146 Roger Byatt	Support the Teddington Society view of 5-6 storeys being too high. Teddington Business Park is very convenient.
Kellie Coyne , 147	Object the Teddington mid-rise zone as it would materially impact the local character and village setting and would encourage extensive development
Gillian Carrick , 148	The mid-rise zone proposal would damage the character of Teddington.
Carlo Malka , 149	Strong objection to the Teddington mid-rise zone. The current business park does not currently cause nuisance, but if it were built upon for flats it would impact parking and local infrastructure. The proposal would have a negative impact on residents.
Charles Hide , 150	Objection to the Teddington mid-rise zone as the proposal has little merit and would be detrimental to the area and residents. High-rise development would create an eyesore and create traffic. It would affect the current quiet character and value of Teddington, with only developers benefitting.
Richard Goldfinch , 151	Objection to the Teddington mid-rise zone as it would destroy the character of the area if used for housing. The replacement of the business park would counter other policies in the plan.
David Laughrin , 152	Pleased in the council's strategy to conserve and enhance the town centre character, however the mid-rise zone contrasts with these objectives. There may be opportunity for occasional mid-rise development but encouraging it within the whole zone risks overdevelopment. Instead individual proposals should be considered on merit.
Safiya & B Atom-Ra , 153	Oppose the Teddington mid-rise zone as it would detriment residents and Teddington as a whole. The plan would block sunlight and encourage less open space and parking would cause issues. The village feel will be lost in this plan as it encourages big developments.
Robert Blakeborough , 154	Objection to the Teddington mid-rise zone as it would adversely change the character. Individual planning applications should be considered on their merits, as opposed to the designation of the zone. The potential loss of the business park is concerning. A rise in traffic and overlooking may disrupt local residents.
Bouquette Kabatepe , 155	Rejection to the Teddington mid-rise zone, as the proposed heights is out of character. It would bring more traffic and a higher population to a town which is not designed for this. Facilities and traffic are already at a critical point.
Greg Castell , 156	Objection to the Teddington mid-rise zone as it will create eyesore and shade.
Kerry Chauhan , 157	The plan destroys Teddington town centre, infrastructure is unable to keep up with demand.
Jo Lynn , 158	Objection to the Teddington mid-rise zone, as it will blight the street scape and village reputation.
Nicky Smith , 159	Objection to the Teddington mid-rise zone
P.J. Deakin , 160	Concerned about the Teddington mid-rise zone as it will have impact on the listed station and surrounding properties. The roads are already congested and the infrastructure should be in place before mor building work.
Joanne Westeng , 161	Horrified by Teddington mid-rise zone plans, as the Travelodge building already presents an eyesore. The traffic would bottleneck with more development and the local facilities are already too busy. The business park is a thriving area for small businesses.
Jean Carlin , 162	The Teddington mid-rise zone would change the character forever, as it is a great place to live it should be left as is.
Ann Whitfield , 163	Supports the strategy for Teddington to enhance and conserve the town centre's character, however the mid-rise zone would not enhance or conserve this character. New planning applications should be considered on their merits as opposed to a presumption for mid-rise buildings being permitted. Concerned for the loss of the business park for office and industrial space.
Angela Hogg , 164	Objection to the mid-rise zone as it would not conserve or enhance Teddington's character.
Stephen Mowat , 165	Concerned about the mid-rise zone as it would change the character or the town, not enhance or conserve it.
Denis Lawson , 166	Concerned about the mid-rise zone, as it would not conserve or enhance Teddington's character.
Christine Knight , 167	Objection to the Teddington mid-rise zone. Previous plans of 3 storeys have been rejected for being unsuitable. The impact of new buildings will affect local residents through visual impact and parking issues.

Jean Strachan , 168	Support the council in finding sites for affordable housing, however concerned that this would require demolishing existing buildings in Teddington. This would cause a loss in businesses and jobs. All new residential buildings should reflect the existing area of 2 storey houses. Houses for sale would not meet the needs of affordable housing.
Dave Gilbert , 169	Suggest that the mid-rise zone should be modified or dropped, on the south side of the zone only 2-3 storey development would keep with character. The current buildings of height are somewhat separated, but the proposed zone would change this situation.
Julia and Julian Mancell Smith , 170	Objection to the Teddington mid-rise zone. Only 6 storey development on the west side would unreasonably affect the character and 2-3 storey to the south. The current buildings of height are somewhat separated, but the proposed zone would change this situation.
Kate Hibbert , 171	Concerned with the plans for the Teddington mid-rise zone, as it will negatively impact the area and will not conserve and enhance its character. Affordable housing is important, but it does not need to be 5-6 storeys. Teddington business park is important for the town.
Stephen Kerigan , 172	Objection to the Teddington mid-rise zone and the loss of Teddington Business Park. The businesses bring economic benefits and employment opportunities, which will suffer if lost.
Rosemary McGlashon, The Teddington Society , 173	To protect the character of Teddington and to preserve the low-level Teddington Business Park, the mid-rise zone should be removed from the plan. The plan says that the council works through the Teddington Society, however no account of the input to the draft plan has been discussed. The mid-rise zone is inappropriate, and no other area has a mid-rise zone right in the town centre. This will encourage developers and remove the public's ability to object on grounds of scale. Existing tall buildings (e.g. Travelodge) already conflict with the area's distinctive and attractive townscape. The Teddington Business Park LSIS is supported, and these sites should remain for local employment and the mid-rise zone acts in contrary to this.
Margaret Ballantyne , 174	Oppose any more high-rise buildings as they will damage Teddington's residential village character. Existing buildings, such as the Travelodge, are already an eyesore.
Roger Hackett, Teddington Residents Association Neighbours of Elleray Hall (TRANEH) , 175	Suggest that the proposal for the mid-rise zone should be modified or dropped, to protect the pleasant residential character. Only 2-3 storey development is appropriate in the south of the mid-rise zone. Existing buildings, such as the Travelodge, are out of character and no further height increases should be allowed.
Margret Stapleton , 176	Concerned over the mid-rise zone, a line of mid-rise buildings would change the character of the town rather than conserving or enhancing it. The zone may cause the loss of the business park and its much needed office and industrial space, alongside disrupting views.
Paul Paul , 177	As a conservation area, additional buildings in the area will be an eyesore and result in overlooking.
Site Allocation 6: Telephone Exchange, Teddington	
David Wilson, Thames Water , 178	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for waste infrastructure. Other: with regard to surface water drainage, Thames Water advise the developer follow the sequential test and aim for greenfield run off rates.
Site Allocation 7: Teddington Delivery Office, Teddington	
David Wilson, Thames Water , 179	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for waste infrastructure. Other: with regard to surface water drainage, Thames Water advise the developer follow the sequential test and aim for greenfield run off rates.
Site Allocation 8: Strathmore Centre, Strathmore Road, Teddington, TW11 8UH	

David Wilson, Thames Water , 180	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for wastewater infrastructure. Other: with regard to surface water drainage, Thames Water advise the developer follow the sequential test and aim for greenfield run off rates.
Site Allocation 9: Teddington Police Station, Park Road, Teddington	
Roger Byatt , 181	Priority should be given to building as relocation site for the Park Road Surgery.
David Wilson, Thames Water , 182	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so waste needs of proposed development can be assessed.
Place-based Strategy for Twickenham, Strawberry Hill & St Margrets	
Graham Martin , 183	The proposal for a bridge connecting Ham to Orleans Road is out of the question, including for safety, because it is overused and narrow. The end of Orleans Road has bats, who are a protected species, so lighting and bridge footings are not appropriate. The proposed site also sits in the Richmond Hill protected view and would damage the conservation area. A bridge at Radnor Gardens would be more appropriate.
Olivia Russell (CBRE), Rugby Football Union (RFU) , 184	The RFU acknowledges that the stadium forms a 'distinctive sub area' which is in contrast to the residential setting (C2 Twickenham Residential character area) and that the stadium (sub area B) has a lower sensitivity to change. In response to CBRE'S regulation 18 representations highlighting the contradiction between the vision and the protection within area C2, the inclusion in the Urban Design Study of creating a masterplan/ vision for the area is welcomed. RFU will engage with the council at the early stage of proposals to ensure it aligns with the draft plans strategic policy 8 to ensure Twickenham's sporting attractions will be maximised, whilst minimising disruption for residents and businesses.
Philip Villars, PMV Planning Limited on behalf of owner of Arlington Works , 185	Previous regulation 18 comments have not been addressed. The map in the area profile is incorrect as it does not differentiate between St Margarets Local Centre and residential. The Arlington Works site could support a mixed-use regeneration scheme, however it has not been included and we do not understand how sites are selected for allocations. The plan should include a place-based policy document to support development, and consider the contribution that sites such as Arlington Works can play in regeneration.
Craig Hatton, Network Rail (Southern) , 186	The place-based strategy is not sound as it does not accord with the spatial strategy. This could be overcome by additions to the wording to actively promote improved access to the rail network for users, referencing capturing developer contributions to fund this.
Luke Burroughs, Transport Trading Limited Properties Limited (TTLP) , 187	Supportive if the Council's recognition of this area as an appropriate location for growth.
Site Allocation 10: St Mary's University, Strawberry Hill	
Tim Brennan, Historic England , 188	Welcome the identification of heritage assets and the acknowledgement as a highly sensitive site, however St Mary's College is Grade II listed not I). The policy should include further text to be more precise of development form with more heritage analysis and research to define the developable area. Further text should be added around future development not only enhancing the character, but the heritage as well.
John Sadler, CPRE London , 190	Concerned proposals for this site are likely to include inappropriate development on MOL.
David Wilson, Thames Water , 190	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so waste needs of proposed development can be assessed.
Jo Edwards, Sport England , 191	Support reference in vision to retain or replace playing fields and sports facilities to equal or better standard

Andrew Miller, Strawberry Hill Residents' Association , 192	Comments from pre-publication consultation stage have not resulted in significant change to wording. The university no longer has plans to extend the footprint of the site, therefore wording is misleading.
Lucy Hale (Gerald Eve), St Mary's University , 193	Reiterate and expand on comments made at Regulation 18 stage. Welcome the inclusion of the campus to support growth. The boundary on the map is not correct, land to the rear of 11 Waldegrave Park is excluded from the red line, this should be incorporated. Include wording at third bullet point in respect to MOL "however, further educational and/ or sports facilities proposed within the MOL designation may be considered acceptable, subject to an appropriate very special circumstances being provided. Consider Teddington Lock Campus as its own allocation or with greater acknowledgement to meet the vision to enhance the educational and sports facilities.
Site Allocation 11: Richmond upon Thames College, Twickenham	
David Wilson, Thames Water , 194	Water: scale of development is likely to require water supply infrastructure upgrades, therefore developers should liaise with Thames Water at the earliest opportunity. The housing phasing should not outpace delivery of improvements. Waste: do not envisage scale of development causing wastewater infrastructure concerns. With regard to surface water drainage developers should follow sequential approach. The proposed development will be located within 15 metres of underground assets, therefore needs to follow the guide for 'working near our assets'.
Jo Edwards, Sport England , 195	Welcome reference in vision to protecting and upgrading the playing field. The PPS action plan does not identify this site for a 3g pitch, however if appropriate there is a requirement for one in the borough.
Site Allocation 12: The Stoop (Harlequins Rugby Football Club), Twickenham	
John Sadler, CPRE London , 196	Any redevelopment should widen the path next to the Duke of Northumberland's Rivers and level access to make it more accessible.
Richard Carr, Transport for London (TfL) , 197	Note the reference to close working with TfL to ensure development does not unacceptably impact the road network.
David Wilson, Thames Water , 198	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so waste needs of proposed development can be assessed.
Jo Edwards, Sport England , 199	Should be made clearer in vision that development proposals should not impact on the stadium area, including stand capacity and pitch.
Nikki Nicholson, Surrey County Council , 200	SCC would advise that LBRuT carefully considers the implications of the proposed allocation on the operation of Twickenham Depot which is safeguarded for waste management.
Site Allocation 13: Twickenham Stadium, Twickenham	
Richard Carr, Transport for London (TfL) , 201	Welcome amendments of wording to remove sufficient and refers to London Plan parking standards and reference to close working with TfL. However, to ensure consistency with London Plan Policy T6 the wording should be amended to just read: 'parking provision in line with London Plan standards'.
David Wilson, Thames Water , 202	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so waste needs of proposed development can be assessed.
Jo Edwards, Sport England , 203	Vision could be made clearer to ensure development does not impact on stadium area including standing capacity and pitch.
Olivia Russell (CBRE), Rugby Football Union (RFU) , 204	Provides further representations from the Regulation 18 representations. RFU support inclusion of the site allocation and acknowledgement of entertainment use for the stadium. Reference to entertainment should be included in the main description, as it is commercially important to the RFU for

	the continued functioning of the stadium as a sports venue. The stadium should be referred to as a sports venue, not grounds in the description. Some of the site does not meet MOL criteria so RFU propose modification in the site allocation wording to remove the reference to this area (eastern edge of Parcel 36) as MOL. The RFU supports working with the Council to develop a masterplan.
Site Allocation 14: Mereway Day Centre, Mereway Road, Twickenham	
David Wilson, Thames Water , 205	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for wastewater infrastructure. Other: management of surface water from new developments should follow policy 5.13 of the London Plan.
Site Allocation 15: Station Yard, Twickenham	
Richard Carr, Transport for London (TfL) , 206	Welcome the addition of references to adequate standing capacity and driver's facilities in relation to bus stands.
David Wilson, Thames Water , 207	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for wastewater infrastructure. Other: management of surface water from new developments should follow policy 5.13 of the London Plan.
Craig Hatton, Network Rail (Southern) , 208	Network Rail supports the allocation of this land and opportunities to maximise density should be sought due to the sustainable nature of the site. Network Rail supports desire to improve access to Twickenham station through improved active travel routes.
Luke Burroughs, Transport Trading Limited Properties Limited (TTLP) , 209	Welcome the site allocation includes TfL landholding. As acknowledged should a replacement location be found for this bus stand development will be enabled to come forward on the site.
Site Allocation 16: Twickenham Telephone Exchange	
David Wilson, Thames Water , 210	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so wastewater needs of proposed development can be assessed. The proposed development will be located within 15 metres of underground assets, therefore needs to follow the guide for 'working near our assets'. With regard to surface water drainage developers should follow sequential approach.
Site Allocation 17: Twickenham Riverside and Water Lane/ King Street	
David Wilson, Thames Water , 211	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for wastewater infrastructure.
Richard Carr, Transport for London (TfL) , 212	Welcome the clarification that 'given the high PTAL, a reduction in car parking is sought to improve the environment of the Embankment
Rachel Holmes, Environment Agency , 213	Welcome that the sit allocation has removed the term 'where viable' in relation to flood defence improvement works.
Site Allocation 18: Homebase, Twickenham Road, Hanworth	
David Wilson, Thames Water , 214	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so wastewater needs of proposed development can be assessed.

Zamir & Violetta Gobra , 215	Suggest a solution to permit building a garage connecting to the Homebase site to avoid a set back between existing houses and proposed uses. Happy to participate in the design and development process of future proposals.
Site Allocation 19: Fulwell Bus Garage, Wellington Road, Twickenham	
Richard Carr, Transport for London (TfL) , 216	Supports the new site allocation and the requirement to retain bus garage use.
David Wilson, Thames Water , 217	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so wastewater needs of proposed development can be assessed.
Craig Hatton, Network Rail (Southern) , 218	Supports the allocation of the site and the opportunities that come with it. Supportive of attempts to secure access improvements to Fulwell rail station and redevelopment would assist in providing improvements. However, in its current form the allocation does not support policy 1 as it fails to identify improvements for all users, instead specific reference should be included to seek developer contributions towards access both in the site allocation and IDP.
Duncan McKane, London Borough of Hounslow , 219	LBH encourage LBRuT to work with TfL and bus operators to ensure there is no interruption to the operation of the garage.
Luke Burroughs, Transport Trading Limited Properties Limited (TTLP) , 220	Recognise the requirement to retain the bus garage use and any development will bring facilities to enable future operational requirements. Agree that the site is appropriate for substantial residential development and supporting retail and employment, but the allocation should clarify that it is expected to be residential led in line with mention of affordable housing. Recommend that 10-15 Wellington Gardens are included in the allocation to ensure high quality public realm could be provided. The text set out in the Urban Design Study is welcome and agree the site is suitable for landmark taller buildings. The wording in the UDS around this should be recognised in the site allocation.
Place-based Strategy for Whitton & Heathfield	
Emma Penson (DWD), Dukes Education Group and Radnor House School , 221	The aspiration for a new public park is not deliverable, effective or justified and the wording should be updated to better reflect the client's proposal for the site.
Nick Dexter, Whitton Community Association , 222	WCC is referred to as a 'day centre' this should be corrected to 'community centre, food bank and pharmacy'.
Site Allocation 20: Telephone Exchange, Ashdale Close, Whitton	
David Wilson, Thames Water , 223	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for waste infrastructure. Other: with regard to surface water drainage, Thames Water advise the developer follow the sequential test and aim for greenfield run off rates.
Site Allocation 21: Kneller Hall, Whitton	
David Wilson, Thames Water , 224	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for waste infrastructure. Other: with regard to surface water drainage, Thames Water advise the developer follow the sequential test and aim for greenfield run off rates. Encourage any development to utilise green SuDS solutions.

Jo Edwards, Sport England , 225	Support reference to retaining and upgrading of playing fields, including ancillary facilities such as changing rooms.
Emma Penson (DWD), Dukes Education Group and Radnor House School , 226	Welcomed that the allocation acknowledges the client's proposal for the site. However, the site is not currently publicly accessible and while the proposals are to provide managed access that will improve accessibility for local community groups and schools, it will not provide public green and open spaces or links through the site and the wording should be amended to ensure it is effective, deliverable and justified. The SINC designation of the site should be given further consideration so it does not preclude the retention and enhancement of playing fields. The clients intend to collaborate with the council to ensure planning permission and listed building consent is secured for the long term protection of the Kneller Hall.
Site Allocation 22: Whitton Community Centre, Percy Road, Whitton	
Joan Gibson , 227	The access to open space section has been cut and pasted from a section about Kew, as it is not local to Kew Gardens station or shopping centre.
David Wilson, Thames Water , 228	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so wastewater needs of proposed development can be assessed.
Nick Dexter, Whitton Community Association , 229	The plan does not mention how affordable housing will be combined with community use. Want reassurance that as drafted on any planning applications issues around access, parking, waste, security and lighting could be raised. Want to ensure future development could retain or replace the hall space and lounges for guests that would be accessible to all. Alongside providing space for small businesses, charities and clubs to regularly use. On affordable housing, want reassurance that a 100% affordable housing scheme considered could then be rejected. Minor amendments to remove reference to Kew under access to open space and state that the building is a single storey building with a double height rear hall, not a part single part two storey building. Alongside 'food bank' being added to the list of activities and the user group aimed at the whole community, men and women, of all ages from small children to senior citizens.
Place-based Strategy for Ham, Petersham & Richmond Park	
Geoff Bond, Ham & Petersham Association & Amenities Group , 230	A consultation that gives weight to Ham and Petersham residents on the proposed bridge in Ham would give a clearer idea of support, given the downsides. Six storey buildings is in opposition the neighbourhood plan, and will be in contrast to the local character. Increased protections of playing fields welcome. Insufficient consideration for the impact of increasing SINC status designation on recreation in Ham Common west side. It would be good for the community to consider a future club house for the cricket club should any COU ensue.
Graham Martin , 231	Initial feasibility for the Ham bridge.
Daniel Reich , 232	Concerns for the location of the bridge due to increased traffic to Ham Street Car Park. Is there reference to a traffic or parking assessment? Location of bridge 13 seems more suitable to increase pedestrian/ cycle access but not car traffic.
Jon Rowles , 233	Some areas of Richmond Park are under stress according to the Royal Parks Management Plan, but this is not reflected in the council's sustainability report. Including the impact of the London Plan Opportunity Area where extra homes will be built, recreational use needs to be diverted.
Katherine Drew, The Royal Parks , 234	Reiterates comments made during the Regulation 18 consultation - in relation to protection of open spaces and impact of traffic.
Rachel Holmes, Environment Agency , 235	Welcome, in line with Regulation 18 response, the emphasis of the need to improve the riverside environment.
Site Allocation 23: Ham Close, Ham	
David Wilson, Thames Water , 236	Water: scale of development is likely to require water supply infrastructure upgrades, therefore developers should liaise with Thames Water at the earliest opportunity. The housing phasing should not outpace delivery of improvements. Waste: Same as above for wastewater infrastructure network.

Site Allocation 24: Cassel Hospital, Ham Common, Ham	
David Wilson, Thames Water , 237	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for wastewater infrastructure.
Nirali Vekaria (Lichfields), West London NHS Trust , 238	The operator should be West London NHS Trust not West London Mental Health Trust. Support for the inclusion of the allocation, but object to aspects of the policy. Support for residential use development that protects listed buildings, alongside partially or fully retaining the site for the Trust. However, as stated social and community infrastructure is not a viable or justified use for the site and a conversion of listed buildings for residential use is optimal. Community element could be mixed-use in line with this subject to demand. Marketing will delay making the site available and a reduced period of 6 months more appropriate. A 100% affordable scheme is not justified. The Trust objects to the requirement for alternative social and community infrastructure, but supports the approach to affordable housing as required by London Plan Policy H5. The heritage considerations are covered in Policy 29, so point 7 may not be needed. The medium timeframe is appropriate.
Place-based Strategy for Richmond & Richmond Hill	
Julie Scurr , 239	There is a theme around increasing food outlets etc. is there is already enough. The plan lacks imagination around retail, which could help build on the 20 minute neighbourhood. Against an increase in the night time economy in Richmond, due to fears of anti-social behaviour. Welcome the redevelopment of the station area, but not a high rise building.
Roger Byatt , 240	Why no plans for pedestrianisation of George Street?
Katherine Drew, The Royal Parks , 241	Welcome comments made at regulation 18 to be considered again.
Craig Hatton, Network Rail (Southern) , 242	Strategy is not sound as it fails to consider improvement to access of public transport facilities. Part of the desire of improving the arrival of North Sheen station should include accessibility. Accessibility improvements should be funded by developer contributions.
Rachel Holmes, Environment Agency , 243	Welcome that, in line with Regulation 18 response, the need to improve the riverside environment is emphasised.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 244	Disappointed by the Council's failure to respond positively to previously submitted comments.
Peter Willan and Paul Velluet, Old Deer Park Working Group , 245	Disappointed by the Council's failure to respond positively to previously submitted comments.
Site Allocation 25: Richmond Station, Richmond	
Louise Fluker, The Richmond Society , 246	Developing buildings of 7-8 storeys behind the façade of the station would look ridiculous and out of place in the surrounding area.
John Sadler, CPRE London , 247	The car park next to the station should be removed and used to create new green space or mixed-use development. The space above the railway tracks should be kept open to promote attractive public transport.

Richard Carr, Transport for London (TfL) , 248	Welcome the reference to a partnership approach with Network Rail and TfL
David Wilson, Thames Water , 249	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so wastewater needs of proposed development can be assessed.
Gerard Manley (Firstplan), Baden Prop Limited , 250	Wording changes to bullet 3,4, 6, 10, 12 and appendix 3 changes are suggested to ensure the plan is positively prepared and justified. BPL are the principle owner of the mixed use Westminster House building, included in the Richmond station allocation, on Kew Road with a complicated planning history. LBRuT generally support the applications for increased building height for non-office use. BPL supports proposed mixed-use, however too much weight is given to office provision. This is unjustified because the employment Land and Premises Needs Assessment identifies a reduction in office use. The building also has vacant offices, alongside other local vacant offices, so additional offices does not meet future need. Westminster House should be included in the tall building zone and the height should be increased beyond 8 storeys. There is no evidence for why Westminster House was not included. The need to diversify town centres is acknowledged in the Town Centre, Retail and Leisure Study (2023), including for residential use. BPL generally support this drafting. Draft Policy 23 relates to resisting loss of office space, despite the ELPNA identifying a reduction in need. The more restricted policy is not justified or consistent with the NPPF or London Plan. Office areas are now renamed Key Business Areas, with the inclusion of Westminster House in the designation not justified.
Craig Hatton, Network Rail (Southern) , 251	Network Rail supports the allocation of this site and the opportunities brought forward by this. Non-railway development should be undertaken to not impact on efficient running of the railway. Development should capture station improvements.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 252	Disappointed for Council's failure to respond to regulation 18 representations for this allocation.
Site Allocation 26: Former House of Fraser, Richmond	
David Wilson, Thames Water , 253	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for wastewater infrastructure
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 254	Disappointed for Council's failure to respond to regulation 18 representations for this allocation.
Site Allocation 27: Richmond Telephone Exchange, Spring Terrace, Richmond	
David Wilson, Thames Water , 255	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed.

	Waste: scale of development is likely to require wastewater supply infrastructure upgrades, therefore developers should liaise with Thames Water at the earliest opportunity to determine whether additional infrastructure is required. A detailed drainage strategy should be submitted with the planning application.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 256	Disappointed for Council's failure to respond to regulation 18 representations for this allocation.
Site Allocation 28: American University, Queens Road, Richmond	
David Wilson, Thames Water , 257	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so wastewater needs of proposed development can be assessed.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 258	Disappointed for Council's failure to respond to regulation 18 representations for this allocation.
Site Allocation 29: Homebase, Manor Road, North Sheen	
Chris Toop , 259	Object to the inclusion of Kew Retail Park and the homebase site for major developments, as it opposes the wishes of the majority of residents whilst making planning approval easier for developers.
Richard Carr, Transport for London (TfL) , 260	Welcome the addition of reference to adequate standing capacity and drivers' facilities. Welcome reference to engagement with TfL to ensure development does not have unacceptable impact on local road network.
David Wilson, Thames Water , 261	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for wastewater infrastructure.
Craig Hatton, Network Rail (Southern) , 262	Supports the allocation of the site and notes there is an application currently subject to determination by the Mayor of London. The proximity to North Sheen train station provides opportunity to secure improvements in line with increase in users. It could benefit from improved facilities, footbridge and cycle storage. The level crossing should be included in the site allocation to secure safety mitigations with increased usage from development. The opportunity remains to capture contributions from redevelopment to improve access to North Sheen station for all, including those with mobility issues.
Smruti Patel (Avison Young), Avanton Richmond Developments LTD , 263	In its current form, the Urban Design Study (2023) is not adequate or proportionate, it doesn't justify the proposed height limit of 7-8 storeys at the Site and the approach to building heights for the Site. In the absence of any evidence to the contrary, it is requested that the TVIA provided at Appendix I is therefore taken into account in determining maximum appropriate heights for the site, as it has been clearly demonstrated that heights up to 11 storeys are acceptable. Furthermore, inadequate justification is provided for the definition of tall buildings across the LBRuT, particularly noting areas of low sensitivity that could be further optimised. As such, Site Allocation 29 and policy 45 (Tall and Mid-rise Building Zones) cannot be considered to be sound as they have not been justified and rely on an inadequate evidence base.

Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 264	Disappointed for Council's failure to respond to regulation 18 representations for this allocation.
Site Allocation 30: Sainsburys, Lower Richmond Road, Richmond	
Richard Carr, Transport for London (TfL) , 265	Welcome reference to London Plan standards in the first point of the vision, however the London Plan states retail development in PTAL 5 should be car free so it is inappropriate to expect car parking to be reprovisioned. London Plan standards for car free development should be made clearer in the wording. Welcome reference to engagement with TfL to ensure development does not unacceptably impact the local road network.
Anna Stott (WSP), Sainsburys Supermarkets Ltd , 266	Welcome inclusion of regulation 18 representations to include car parking provision, however this should also include providing servicing areas and operational land as well. This will ensure future commercial uses can operate efficiently.
Craig Hatton, Network Rail (Southern) , 267	Supports allocation of the site, however the opportunity remains to capture contributions from redevelopment to improve access to North Sheen station for all, including those with mobility issues. The level crossing should be referenced in the site allocation to secure safety mitigations with increased usage from development
David Wilson, Thames Water , 268	Water: scale of development is likely to require water supply infrastructure upgrades, therefore developers should liaise with Thames Water at the earliest opportunity. The housing phasing should not outpace delivery of improvements. Waste: do not envisage scale of development causing wastewater infrastructure concerns. Other: with regard to surface water drainage, Thames Water advise the developer follow the sequential test and aim for greenfield run off rates.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 269	Disappointed for Council's failure to respond to regulation 18 representations for this allocation.
Place-based Strategy for Kew	
Julie Scurr, 270	Massive increase in population planned for Kew/North Sheen out of proportion to its current population with no commitment for increasing visible policing.
Craig Hatton, Network Rail (Southern) , 271	Supports the strategy for Kew especially in maintaining and enhancing retail offer and wayfinding around Kew Gardens station, including promoting active travel.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 272	Disappointed for Council's failure to respond to regulation 18 representations for this allocation.
Peter Willan and Paul Velluet, Old Deer Park Working Group , 273	Disappointed for Council's failure to respond to regulation 18 representations for this allocation.

Site Allocation 31: Kew Retail Park, Bessant Drive, Kew	
Chris Toop, 274	Strongly reject the inclusion of Kew Retail Park and the Homebase site as locations for major development. Its against the wishes of the majority of residents and makes planning approval easier for developers.
Tim Brennan, Historic England , 275	Site allocation policy is ambiguous in terms of evidence for decision for tall building allocation for parts of the site. More explicit link to the evidence on heritage assets and character would be useful. Support the development of a masterplan of the site and would be pleased to be involved.
Richard Carr, Transport for London (TfL) , 276	The PTAL for a large part of the site is 2, including the entrance, so this should be the baseline as opposed to PTAL 0 influenced by lack of access to the rear of the site. Welcome confirmation that car parking provision should be in line with London Plan standards.
Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer , 277	Availability of the Kew Retail Park site for redevelopment is dependent on significant reprovision of replacement retail floorspace (a replacement M&S store). Evidence set out indicates there is a need to improve convenience good provision in Kew to ensure main food shop needs are met, which will help achieve the living locally policy at the heart of the plan. The key evidence shows residents in much of Kew do not live within 800m of a supermarket for main shop need, so they are travelling well in excess of this. Food shopping for residents is primarily undertaken at out-of-centre locations. Kew Gardens centre only attracts 4% of main food market share. The M&S in KRP is trading significantly over company benchmark turnover.
David Wilson, Thames Water , 278	Water: scale of development is likely to require water supply infrastructure upgrades, therefore developers should liaise with Thames Water at the earliest opportunity. The housing phasing should not outpace delivery of improvements. Waste: same as above for wastewater infrastructure.
Rachel Holmes, Environment Agency , 279	We understand that the site allocations must be in line with other policies in the Local Plan and therefore that it is not necessary to reiterate these requirements within the site allocation.
Site Allocation 32: Kew Biothane Plant, Melliss Avenue, Kew	
Rachel Holmes, Environment Agency , 280	Identified as a key opportunity site for Water Framework Directive (WFD) improvement by way of realignment of flood defence. Intertidal terracing by setting back the footprint of the defence between Kew and Chiswick Bridge will provide improvement to WFD status through biodiversity benefits. Any development, therefore, should come with the expectation of carrying out such intertidal enhancement.
David Wilson, Thames Water , 281	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for wastewater infrastructure Other: with regard to surface water drainage, Thames Water advise the developer follow the sequential test and aim for greenfield run off rates.
Saffron Frost (Savills), Melliss Ave Devco Limited (in Administration) c/o RSM , 282	Modifications sought for the vision in line with the planning context and the Council's reasons for granting the 2018 permissions given the circumstances have not significantly shifted since then. This includes a range of housing for different housing needs in line with policy 12. In reference to MOL include in very special circumstances development that would outweigh the harm to MOL would be acceptable in line with policy 35.
Site Allocation 33: Pools on the Park and surroundings, Old Deer Park, Richmond	
David Wilson, Thames Water , 283	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so wastewater needs of proposed development can be assessed.
Peter Willan and Paul Velluet, Old Deer Park Working Group , 284	Disappointed for Council's failure to respond to regulation 18 representations for this allocation.
Site Allocation 34: Richmond Athletic Association Ground, Old Deer Park, Richmond	

David Wilson, Thames Water , 285	Water: include an indication of type and scale of development for each site so water infrastructure needs of proposed housing provision can be assessed. Waste: same as above so wastewater needs of proposed development can be assessed.
Jo Edwards, Sport England , 286	Support vision for the retention/ improvement of playing field.
Place-based Strategy for Mortlake & East Sheen	
Richard Carr, Transport for London (TfL) , 287	No updates from regulation 18 representations.
Councillor Niki Crookdake , Green Party Councillor for Mortlake & Barnes Common, 288	Include comments sent on the 4 th April 2023, which were not included in the draft correcting inaccuracies, the officer's decision to not include these points was not justified. Include modifications suggested for the place-based strategy, including acknowledging the lack of open green space, the need to upgrade Mortlake High Street, traffic congestion and the PTAL. Suggestion of a green link bridge connecting the north and south towpaths, if feasible, and reference to Chertsey Court as another site allocation.
Katherine Drew, The Royal Parks , 289	Grateful if comments from regulation 18 in relation to recognising designations and protections of parks could be considered again.
Craig Hatton, Network Rail (Southern) , 290	Supports reference to enhance the sense of arrival and quality of public realm, including improved accessibility, at Mortlake Station. However, it is not sound as it fails to accord with the plans spatial strategy. This can be overcome by additions of wording to capture developer contributions to fund improvements to improved access for all rail users. Reference should also be made to the level crossing as redevelopment will result in conflict between vehicles, pedestrians and cyclists which should be referenced in policy.
Rachel Holmes, Environment Agency , 291	Welcome that the policy section, in line with EA's regulation 28 response, emphasises need to improve the riverside environment.
Site Allocation 35: Stag Brewery, Lower Richmond Road, Mortlake	
Tim Brennan, Historic England , 292	Sensitive site. For the interest of clarity ensure that sensitivities set out in page 177 of the Urban Design Study are included in the allocation vision.
Richard Carr, Transport for London (TfL) , 293	Reiterate regulation 18 comments proposed bus standing on the site should be regarded as additional and independent to existing standing facility. To be consistent with London Plan Policy T3 remove reference to Avondale bus station with replacement wording suggested.
Jo Edwards, Sport England , 294	Supports the retention/ reprovision of playing field in the vision.
David Wilson, Thames Water , 295	Water: scale of development is likely to require water supply infrastructure upgrades, therefore developers should liaise with Thames Water at the earliest opportunity. The housing phasing should not outpace delivery of improvements. Waste: same as above for wastewater infrastructure. Other: with regard to surface water drainage, Thames Water advise the developer follow the sequential test and aim for greenfield run off rates.
Craig Hatton, Network Rail (Southern) , 296	The allocation indicates significant redevelopment to effectively provide a new centre for Mortlake which will exacerbate safety challenges of the level crossing. Third-party contributions should be sought to address issues arising from development.
Tim Catchpole, Mortlake with East Sheen Society , 297	Agree with 7-storey height limit shown in the planning brief and are disappointed to see a 9 and 8-storey buildings approved. Do not accept there is a need for a secondary school plus sixth form.

Rachel Holmes, Environment Agency , 298	The site is identified as a key opportunity for WFD improvement through managed realignment of flood defence. Recommend development comes with the expectation of carrying out intertidal enhancement. Acknowledged the reason for not including additional references to flood risk requirements included within other policies.
Councillor Niki Crookdake , Green Party Councillor for Mortlake & Barnes Common, 299	Modifications necessary including tracked changes including embracing green infrastructure initiatives and a green link bridge with the Thames towpath.
Site Allocation 36: Mortlake and Barnes Delivery Office, Mortlake	
David Wilson, Thames Water , 300	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for wastewater infrastructure Other: with regard to surface water drainage, Thames Water advise the developer follow the sequential test and aim for greenfield run off rates.
Site Allocation 37: Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen	
David Wilson, Thames Water , 301	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for wastewater infrastructure Other: with regard to surface water drainage, Thames Water advise the developer follow the sequential test and aim for greenfield run off rates.
Site Allocation 38: Barnes Hospital, East Sheen	
David Wilson, Thames Water , 302	Water: current information indicates no infrastructure concerns for water infrastructure, however developers should liaise early as possible with Thames Water. Waste: Same as above for wastewater infrastructure Other: with regard to surface water drainage, Thames Water advise the developer follow the sequential test and aim for greenfield run off rates.
Rachel Holmes, Environment Agency , 303	Welcome that reference to our intention to update the flood risk modelling has been noted as part of this site allocation.
Place-based Strategy for Barnes	
Craig Hatton, Network Rail (Southern) , 304	Support the strategy in seeking to improve connectivity, wayfinding and improving public realm around the station. Network Rail are keen to help the Council in this aim and will investigate funding opportunities, believe a similar approach could be adopted for other stations in the borough in other place-based strategies.
Rachel Holmes, Environment Agency , 305	Welcome that this place-based strategy has been updated in line with our Regulation 18 consultation response to ensure that any works to the terrace are in accordance with other flood risk and biodiversity policies.
Policies	
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 306 and	Picks up an issue with the formatting where there is a title 'Policies' with no text underneath.

Peter Willan and Paul Velluet, Old Deer Park Working Group , 307	
Responding to the climate emergency and taking action	
Tim Brennan, Historic England , 308	Recognises the urgent need for positive action to tackle climate change, however, is suggests it would be useful to make clear that inappropriate while well-intentioned retrofit measures to historic buildings may not only adversely affect heritage significance but could also worsen rather than reduce carbon emissions. Recommend it is made clear in Policy 4 that refurbishment/retrofitting projects to improve energy efficiency will also need to satisfy the requirements of policies elsewhere in the plan dealing with change to heritage assets. Also suggests some additional explanatory text to be added to Chapter 16.
Elena Mikhaylova , 309	Does not believe there is a climate crisis. Concerned that the Council have used a small biased study to justify this policy. Raises that local people did not ask the Council to declare a climate emergency. Fear that this could be used to restrict people's freedoms. Concerned with the financial burden to local people and businesses.
Tim Catchpole, Mortlake with East Sheen Society , 310	No comments to raise on Policies 3 to 9, following the Council's responses to previous comments on decentralised energy networks, water resources and aspects of flood risk including storm surges.
Policy 3. Tackling the climate Emergency (Strategic Policy)	
Louise Fluker, The Richmond Society , 311	Concerned that this policy does not acknowledge that older building will need to be retrofitted to meet emissions targets and achieve greater energy and water efficiency. Suggests amendments to part D.
James Stevens, Home Builders Federation , 312	Raises that Part B of the policy is unsound due to being imprecise. Concerned that it is not clear what this means for new residential development in the Borough. Mentions new development needing to be zero carbon but doesn't set out when this is expected by.
Zoe Chick, River Thames Scheme , 313	Support this policy, in particular parts 5, 6 and 7.
Rachel Holmes, Environment Agency , 314	Welcome that a reference to flood storage as well as flood risk has been incorporated into Part B of this policy.
Rachel Holmes, Environment Agency , 315	Feel that the intrinsic link between the climate emergency and biodiversity crises should be emphasised within this policy. Concern that biodiversity is only mentioned once during this policy yet climate change is one of the main drivers of biodiversity loss and the destruction of ecosystems undermines nature's ability to regulate greenhouse gases. Think a link should be made to the net gain policy 39.
Richard Mundy , 316	Concern that the Local Plan discourages cost effective decarbonisation, particularly in conservation areas. Mentions that encouragement should be given to replace single pane windows with double glazing, the installation of solar panels in appropriate directions and allow people to add bike shelters and car chargers in front of their houses.
Elena Mikhaylova , 309	Does not believe there is a climate crisis. Concerned that the Council have used a small biased study to justify this policy. Raises that local people did not ask the Council to declare a climate emergency. Fear that this could be used to restrict people's freedoms. Concerned with the financial burden to local people and businesses.
Policy 4. Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)	
Louise Fluker, The Richmond Society , 317	Concern that Policy 4 does not reference retrofitting of existing housing stock or buildings but Policy 3 refers to the importance of this, feels the Councils position on this needs to be made clear.

<p>James Stevens, Home Builders Federation, 318</p>	<p>Thinks the Council should not insist on development being net zero from the date of Adoption. Instead, should adhere to the government’s agreed programme of moving towards net zero from 2025 onwards. Believes it is not feasible technically at present to build to net zero owing to a combination of the lack of deployable and cost-efficient technologies and skills shortages. Points to the stepped targets set out through the Building Regulations, which enable buildings to be zero carbon ready in a series of steps.</p> <p>Worries that accelerating this timetable will have serious cost implications and consequently, serious implications for housing delivery.</p> <p>Concerned that there might be safety issues with building technologies proposed to achieve zero carbon, as there has not been time for rigorous testing. Believes that the ambition to build homes quickly and sustainably risks being prioritised at the expense of building safety. Consequently, stresses the need for the Council to adhere to the national timetable for moving towards zero carbon homes, delivered through the build Regulations, to avoid encouraging the deployment of untested technologies.</p> <p>Highlights that requiring net zero for homes will challenge housing supply and therefore threatens the supply of affordable homes in the Borough. Feels this is misaligned with other policies elsewhere in the Plan. Mentions that the cost of complying with zero carbon could make some schemes unviable. Thinks the Council should reconsider the requirement for zero-carbon homes so it is better able to prioritise affordable housing supply.</p>
<p>Smruti Patel (Avison Young), Avanton Richmond Developments LTD, 319</p>	<p>Concern that Policy 4 is not in conformity with national policy or the London Plan. Highlights the £300/t rate – Feels the evidence base needs to consider best industry practise schemes to demonstrate whether the £300/t rate would place unreasonable burden on developments and jeopardise the viability of future schemes. The Local Plan Viability Assessment (2023), in testing the carbon offset rate of £300/t, the results find that it would not be viable for a significant proportion of the testing scenarios and it has not been demonstrated, as required by the London Plan, that the price does not place an unreasonable burden on development.</p> <p>Suggests that in lieu of an appropriate evidence base for the £300/t carbon offset figure, it is recommended that the LBRuT local plan defers to the GLA viability tested £95/t figure in accordance with the London Plan (2021).</p> <p>Concerned that the requirements go beyond the currently adopted national and London Plan policies. It is recommended that the policy targets be amended to track London Plan 2021 targets, which shall develop in-sync with the Future Homes/Buildings Standard.</p>
<p>Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer, 320</p>	<p>Policy 4, as currently drafted, is not in accordance with national policy, not in general conformity with the London Plan, nor justified. Recommend that it is amended to fully conform with the London Plan.</p> <p>The incorporation of Approved Document Part O 2021 (AD O) is welcomed, but notes that the wording in the Draft Local Plan is incorrect. AD O relates to residential buildings only, and TM52 and TM59 are represented the wrong way around in print, as these relate to non-domestic and domestic respectively. Raises that an evidence base has now been provided in an attempt to justify setting £300/t rate (Climate Change – Local Plan Net Zero Carbon evidence base, April 2023). Concern that this study has been completed retrospectively after the issue of the Regulation 18 Draft Local Plan as justification for setting the carbon offset payment rate, questions how sound the evidence is in validating the Regulation 18 policy. The evidence base does not contain any discussion on the suitability of the £300/t rate, and the ‘best practice’ specification used in the sample study assumes an exemplary level of building fabric performance aligning with PassivHaus standards, not best practice. Argues that the result of this can be seen in lower than usual offset payments, which are not representative of current industry practices and therefore places an unreasonable burden on developments and would jeopardise the viability of future schemes.</p> <p>Highlights GLA guidance and that the London Plan carbon offset price of £95 per tonnes has been tested as part of the GLA’s viability assessment. Feels a justified evidence base for the £300/t figure has still not been provided</p>
<p>Summer Wong (RPS), Notting Hill Genesis, 321</p>	<p>Supports the Council’s aspirations of achieving net-zero carbon by 2043 and minimising greenhouse gas emissions, but question the onerous policy requirement of Policy 4 which goes beyond the London Plan policy without evidence-based justification.</p>

	<p>Worried that the target set by Policy 4 seeks a higher level of on-site reduction in carbon (60%) and an even higher offset rate of £300/t when compared with the London Plan Policy SI2, this could significantly impact viability of residential schemes, thereby jeopardising the Council's aim to meet its housing targets and the delivery of affordable homes.</p> <p>Feels the Net Zero Carbon Study (March 2023) prepared by CIS, did not provide any evidence to demonstrate how the £300/t offset rate has been calculated. Moreover, the evidence base report on Local Plan Viability Assessment (April 2023) prepared by BNP Paribas Real Estate did not carry out any viability assessment on how the increased carbon offset rate would impact on development viability.</p> <p>Policy 4 in its current form is not in general conformity with the London Plan, nor justified. Suggests wording amendments to make the policy sound.</p>
Neil Henderson (Gerald Eve), Reselton Properties , 322	Reiterates their previous comments – Concern that the proposed carbon offset of £300 p/t may render many schemes unviable, particularly when there are other ambitions such as affordable housing. Suggest that where it can be demonstrated that a payment in lieu is required, there should be discretion in the policy to allow this payment to be directed to other priorities in the Development Plan where it is considered appropriate to do so.
Natasha Styles (The Planning Bureau Limited), McCarthy & Stone Retirement Lifestyles Ltd , 323	<p>Thinks that Policy 4 and 6 are confused and need clarification:</p> <p>Policy 4 point D 1. seeks '<i>to achieve net-zero carbon with a minimum of 60% on-site reduction;</i>' but what is this reduction measured against? Is it the building regulations or is it the Council's intention to fall in line with the Future Homes Standards?</p> <p>Para 16.11 then states '<i>All development (residential and non-residential) should be net-zero, which means that a certain percentage of regulation carbon emissions has to be achieved on-site (see Table 16.1 above), with the remaining emissions (up to 100%) to be offset through a contribution to the Council's Carbon Offset Fund.</i>' Policy 4 then seeks a £300 per tonne contribution for off-site delivery as it is '<i>considered</i>' that the London Plan off set price of £94/tonne is too low'. There also seems to be some cross-over with Policy 6 Sustainable Construction Standards that requires developers to complete a Sustainable Development Checklist and to achieve a four star rating under the BRE Home Quality Mark Scheme.</p> <p>Feels aligning the Council's requirement for carbon neutral development with those of Government would be pragmatic and more achievable without adding additional cost through carbon off-set.</p> <p>Recommends requirements are stepped in line with government targets and the Council consider combining policies 4 and 6.</p>
Henry Brown (The Planning Lab), Royal Botanic Gardens Kew , 324	Notes that LBRuT is considering producing further guidance on energy efficiency in historic buildings. Due to the potential this has to impact Kew Gardens, raise they would be grateful for some further information on the programme for progressing this and opportunities to be involved.
Tim Brennan, Historic England , 308	Recommend it is made clear in Policy 4 that refurbishment/retrofitting projects to improve energy efficiency will also need to satisfy the requirements of policies elsewhere in the plan dealing with change to heritage assets.
Elena Mikhaylova , 309	Does not believe there is a climate crisis. Concerned that the Council have used a small biased study to justify this policy. Raises that local people did not ask the Council to declare a climate emergency. Fear that this could be used to restrict people's freedoms. Concerned with the financial burden to local people and businesses.
Policy 5. Energy Infrastructure (Strategic Policy)	
Elena Mikhaylova , 309	Does not believe there is a climate crisis. Concerned that the Council have used a small biased study to justify this policy. Raises that local people did not ask the Council to declare a climate emergency. Fear that this could be used to restrict people's freedoms. Concerned with the financial burden to local people and businesses.
Policy 6. Sustainable Construction Standards	
David Wilson, Thames Water , 325	Support the reference to water conservation/efficiency in Policy 6, but thinks this needs to be strengthened to ensure the more effective implementation of water efficiency.

	<p>Set out that the Environment Agency has designated the Thames Water region to be an area of “<i>serious water stress</i>”. Argue that future pressures on water resources will continue to increase due to population growth and climate change.</p> <p>Raise that water efficiency measures employed in new development are an important tool to help sustain water supplies for the long term.</p> <p>Support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG and support the inclusion of this requirement in this Policy.</p> <p>Understand that the water efficiency standards of 110 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Favours the Fittings Approach over the Calculation Method (Part G of Building Regs, Table 2.2), for water performance levels.</p> <p>Set out the environmental incentives Thames Water have introduced for developers for implementing water efficiency measures in the form of discounts to connection charges.</p>
<p>Elena Mikhaylova, 326</p>	<p>Concerned that requiring development to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day is a direct violation of the human rights. Thinks the individuals who developed this standard should be taken to Court if this is implemented.</p>
<p>Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer, 327</p>	<p>Concern that this policy is not in accordance with national policy, not in general conformity with the London Plan, nor justified.</p> <p>Highlights that the Regulation 19 policy wording now includes a ban on gas boilers after 2024. This is not considered to be a sound policy as it is not consistent with national policy on banning this technology. The London Plan allows low NOx gas boilers to be permitted on developments as part of a viable energy strategy in certain circumstances, noting that they are suitable when it has “<i>been clearly demonstrated that all of the above [stages of the energy hierarchy] have been fully investigated and ruled out with sufficient evidence provided</i>”.</p> <p>The ban on gas boilers by 2024 contradicts Regulation 19 Policy 3 B1 which references the London Plan energy hierarchy, of which gas boilers are a part of. This allows developments to achieve carbon reduction targets with a flexible design approach, which is most suitable and viable to each scheme.</p> <p>Recommended that gas boiler ban from 2024 is removed from policy wording, to allow national policy to set the pace as the national grid continues to decarbonise, allowing flexibility in accordance with the London Plan.</p>
<p>Summer Wong (RPS), Notting Hill Genesis, 328</p>	<p>Welcome the commitment to achieve the highest standards of sustainable design and construction.</p> <p>Feel that the requirement of BREEAM Outstanding is considered onerous and could affect the viability of residential refurbishment schemes and non-residential development of over 100sqm.</p> <p>Highlights that the evidence base provided by the Net Zero Carbon Study (March 2023) acknowledges that smaller development may struggle to exceed BREEAM Excellent.</p> <p>Concerned that it is unrealistic to expect almost all of residential and non-residential development in Richmond to achieve an BREEAM Outstanding rating. This requirement could deter any new commercial development in Richmond and therefore be contrary to the Council’s Strategic Vision to support growing businesses.</p> <p>Suggests wording amendments be made to the policy, removing from Policy 6 references to the requirement for BREEAM Outstanding rating, and replacing them with the London Plan 2021 target BREEAM minimum performance for selected key credit criteria, such as energy and water.</p>
<p>Natasha Styles (The Planning Bureau Limited), McCarthy</p>	<p>Thinks that Policy 4 and 6 are confused and need clarification:</p> <p>Policy 4 point D 1. seeks ‘<i>to achieve net-zero carbon with a minimum of 60% on-site reduction;</i>’ but what is this reduction measured against? Is it the building regulations or is it the Council’s intention to fall in line with the Future Homes Standards?</p>

<p>& Stone Retirement Lifestyles Ltd, 323</p>	<p>Para 16.11 then states ‘All development (residential and non-residential) should be net-zero, which means that a certain percentage of regulation carbon emissions has to be achieved on-site (see Table 16.1 above), with the remaining emissions (up to 100%) to be offset through a contribution to the Council’s Carbon Offset Fund.’. Policy 4 then seeks a £300 per tonne contribution for off-site delivery as it is ‘considered’ that the London Plan off set price of £94/tonne is too low’. There also seems to be some cross-over with Policy 6 Sustainable Construction Standards that requires developers to complete a Sustainable Development Checklist and to achieve a four star rating under the BRE Home Quality Mark Scheme.</p> <p>Feels aligning the Council’s requirement for carbon neutral development with those of Government would be pragmatic and more achievable without adding additional cost through carbon off-set.</p> <p>Recommends requirements are stepped in line with government targets and the Council consider combining policies 4 and 6.</p>
<p>Policy 7. Waste and the Circular Economy (Strategic Policy)</p>	
<p>Philip Villars, PMV Planning Limited on behalf of owner of Arlington Works, 329</p>	<p>Disappointed that their previous representations have not been addressed in the Regulation 19 version of the Plan but remain keen to work with officers and the local community to discuss how this site can best contribute towards meeting the needs of the area and the wider Borough.</p> <p>Raise that the Arlington Works site is proposed to be identified as an ‘existing safeguarded waste site’, however, point out that this waste use ceased more than 5 years ago having been cleared in 2018 following closure of the associated waste oil transfer and treatment business. Also highlights that the Environment Agency’s environmental permit for this site has been accepted for surrender, following removal of the sites infrastructure. Sets out that this would mean any future use of the site would therefore require planning permission and gaining an environmental permit from the EA. Believe there is no reasonable prospect of an application coming forward for a waste use on the site, given its size and location within a residential area. Plus, it is unlikely that the EA would ever grant a new permit for a waste operation at the location without a building being erected as per its most recent guidance relating to appropriate measures for pollution control. The remainder of the site has no allocation and yet is clearly in need of development.</p> <p>Argue that the Richmond Local Plan is the most appropriate place to release the site. Mentions the review of the West London Waste Plan, but highlights there is no prospect of a review of the identification of the site taking place in the short/medium term.</p> <p>Sets out that there is no justification or need served by the land at Arlington Works continuing to be identified as a safeguarded waste site at all. Not only does the site make no contribution to the waste management provision in London (and hasn’t for many years) and will continue in this way, by continuing to identify it as such it frustrates the appropriate development of the wider site that can make a valuable contribution to the Borough’s needs in terms of jobs and homes.</p> <p>Highlights that the site is a notable regeneration opportunity with plenty of potential.</p> <p>Concern that unless the safeguarded site listing is revisited, as currently drafted, the Plan will continue to safeguard a disused and unsustainable waste site. This would be in direct conflict with Policy GG2 of the London Plan relating to making the best use of land. The Arlington Works site should therefore be re-allocated through this Local Plan review process.</p> <p>Feels the list of safeguarded sites can be reviewed through the Authority Monitoring Report. Notes that previous AMRs have released previously safeguarded sites and that other authorities party to the WLWP have also released land allocated for waste uses.</p> <p>Note that Proposed Allocation 12 for The Stoop is immediately adjacent to an identified safeguarded waste site within the Borough, Twickenham Depot, that is also allocated to assist in meeting the London Plan apportionments for the combined West London Boroughs, so should be afforded a high level of protection under safeguarding policy.</p>
<p>Nikki Nicholson, Surrey County Council, 330</p>	<p>Welcomes the approach to waste management in the Richmond Local Plan and its emphasis on providing for a circular economy.</p> <p>Suggests that reference is made in Policy 7 to the Waste Hierarchy.</p>

	<p>It may also be helpful to reference paragraph 8 of the National Planning Policy for Waste 2014 (NPPW). Explains how the London Borough of Richmond upon Thames should determine applications for non-waste development in the context of sustainable waste management. Paragraph 4 of Policy 7 does not provide certainty in this regard particularly in respect of the statement that “developments that are likely to generate large amounts of waste, are required to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials”. Paragraph 8 of the NPPW explains that for all non-waste development the London Borough of Richmond upon Thames should ensure that “the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities and minimises off-site disposal.</p>
<p>Rachel Holmes, Environment Agency, 331</p>	<p>Set out that a requirement for a Construction Environment Management Plan (CEMP) for all development using the river to transport construction materials and waste to demonstrate how the river will be protected. Recommend that this requirement is stated within the policy, as the protection of the river ecosystem is of paramount importance.</p>
<p>Policy 8. Flood Risk and Sustainable Drainage (Strategic Policy)</p>	
<p>Alan Smith, 332</p>	<p>Concern that there is a mismatch in the content of the Draft Local Plan and its related Sustainability Appraisal on Flood Risk Strategies and risk reductions/ no intensification of use/ provision of compensation required. Feels the LBRuT policies and strategies must be wholly dependent on a joined up river basin strategy with the EA and others. Thinks the wording here needs to be clear, currently feels it isn't. Raises the potential for a tidal/storm surge from the North Sea. Highlights the case study of devastating floods in German in 2021. Concern that both the LBRuT SFRA and this Draft Local Plan / Sustainability Appraisal and the EA / River Thames Scheme still rely on similar flood planning and pre-warnings to evacuate the areas at risk – not prevent / mitigating flooding by upper river risk management and slowing the flow rates. Highlights that the flood re insurance scheme does not extend to flats, of which there are many along the LBRuT's river boundary. Feels the Strategic Flood Risk documentation and its maps require more direct and positive risk reductions than those set out in the Draft Local Plan. This must be done in cooperation with other national agencies. Feels this Plan is inadequate in terms of detail and proposed measures to reassure residents. The need to redevelop key sites in central Teddington is acknowledged but thinks these local sites must be examples of how the future flood risks generally will be mitigated / removed as part of any medium / long term plan. Concerned that this Plan is inadequate as drafted and all related flood risk strategies need a further review. Thinks the Plan should include all related risks of sewage flooding is the system is overwhelmed by fluvial/surface water flooding. Adds that the National Emergency Phone Alert Test didn't work for them. Makes the point that it is crucial that all development and all areas with conflicting interests are identified and given priorities to enable efficient evaluation of pre-development options prior to formal applications for statutory consents. Concerning flood risks, life safety and related property damage, acknowledgement must be given to raised surface water levels in any lower river basin catchment areas may be the result of issues outside of the Local Plan catchment. This needs to be clearly reflected in the Local Plan, currently it isn't. Concludes that a joined up approach is required and currently this appears not to have been done.</p>
<p>David Wilson, Thames Water, 333</p>	<p>Support the reference to flooding from sewers. Support paragraphs 16.73-16.75 in relation to control of surface water to public sewer.</p>

	<p>Highlights that by their nature, sewage treatment works are located close to or adjacent to rivers and that existing works will need to be upgraded or extended to provide the increase in capacity needed to service new development. Raises that flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>Flood risk policies should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> <p>Raises that it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the London Plan drainage hierarchy (Policy SI 13). It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Stresses that limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Sets out how they have advocated for an approach to SuDs that limits as far as possible the volume of and the rate at which surface water enters the public sewer system.</p> <p>Raise concerns about subterranean development:</p> <p>Sets out that the scale of urbanisation throughout London is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water’s sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network.</p> <p>Adds that by virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows.</p> <p>Support for paragraph 16.87.</p>
<p>Nikki Nicholson, Surrey County Council, 334</p>	<p>Support for part 14 of Policy 8 that requires applicants to demonstrate that their proposals take into account the River Thames Scheme and demonstrate how the current and future requirements for flood defences have been incorporated into the development. We also note the references to the River Thames Scheme in the Infrastructure Delivery Plan.</p> <p>Suggest that policy 8: flood risk and sustainable drainage could be shortened and made more concise through using links and references to the NPPF. Also suggest that further reference is made to the River Thames Scheme in the supporting text for policy 8.</p>
<p>Zoe Chick, River Thames Scheme, 335</p>	<p>Supports that, in terms of flood defences, applicants will have to take into account the River Thames Scheme (RTS).</p> <p>Raises that they would like to see the council’s support for the RTS embedded in Policy 8 itself, or in the supporting text. This is so that it is recognised that the RTS is an important project providing flood resilience alongside biodiversity, public open space, and active travel improvements. In addition, it would be beneficial to replicate the below text in the evidence base in documents such as the Infrastructure Delivery Plan.</p> <p>Suggests additional text to be added to Policy 8 or in the supporting text which sets out the RTS and the impact of the scheme.</p>
<p>Smruti Patel (Avison Young), Avanton Richmond Developments LTD, 336</p>	<p>Concerned that policy 8 is not in accordance with national policy, not in general conformity with the London Plan, nor justified.</p> <p>Set out that part A of draft policy 8 requires that a sequential approach is taken to the layout of sites, locating development in areas at lowest risk of flooding on a site. Note that this applies a more restrictive requirement to development than national policy and there has been no justification provided for why this is appropriate for the LBRuT. Reference part a of paragraph 167 of the NPPF, which only goes so far as requiring the most vulnerable development to be located in areas of lowest flood risk within the site, and goes on to allow consideration of overriding reasons to prefer a different location. Feel that</p>

	<p>draft policy 8 is not in accordance with the NPPF and does not enable the consideration of site-specific circumstances. In turn, this conflicts with national and regional policy objectives to optimise the development capacity of sites.</p> <p>We understand that the LBRuT have prepared a Flood Risk Sequential Test (2021 and update 2023). Raise that these reports, which form part of the evidence base underpinning the draft plan, have not been made publicly available and it is therefore not possible to assess the evidence base against the requirements set out in paragraph 31 of the NPPF.</p>
<p>Rachel Holmes, Environment Agency, 337</p>	<p>Part A of Policy 8 – Supports that ‘Flood Risk and Sustainable Drainage’ (Strategic Policy) has been updated to clarify the role of policy and guidance and that it now incorporates a reference to the sequential approach.</p> <p>Raise that in their Regulation 18 consultation response, they recommended that the term ‘minimise’ be removed from Part A of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy). Doesn’t feel that the ‘Statement of Consultation – Local Plan’ (dated June 2023) provides clear reasoning for not following our recommendation. We advise that the term ‘minimise’ is removed in the final draft of the Local Plan.</p> <p>Part B of Policy 8 - Welcomes some updates to Part B of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy) in line with their Regulation 18 consultation response, such as by referencing the Environment Agency as well as the Lead Local Flood Authority (LLFA).</p> <p>However, raise that it is still unclear that fluvial and tidal flood risk as well as surface water flood risk must be mitigated for. At present it states that applicants must address the ‘predicted 1 in 100 year Risk of Flooding from Surface Water (RoFSW) mapped depths as a minimum’. These mapped depths are not relevant for assessing and addressing fluvial and tidal flood risk. Therefore, it appears to show that only surface water flooding must be considered and addressed. Whilst the supporting paragraphs (paragraphs 16.69 and 16.70) and the SFRA highlight the specific requirements for addressing fluvial and tidal flood risk, in terms of finished floor levels and compensation. Raise that the policy itself needs to make it clear that these are required by developments too. Otherwise, developers may believe this is simply guidance and not a mandatory policy requirement.</p> <p>Query whether the tidal and fluvial mapped depths should be mentioned here as well as the surface water one? Or, should the surface water depths not be mentioned here, and only be mentioned in the supporting text like the tidal and fluvial ones at present? Additionally, should the surface water aspects be moved to Part H ‘Sustainable Drainage’ to be collated all together, or is it purposefully separated into different parts of the policy?</p> <p>Is the ‘mitigation and resilience against flood risk’ mentioned in this section only in relation to ‘compensation’ that is mentioned, or are you wishing to address raising finished floor levels within this part of the policy too?</p> <p>Recommend that the policy is updated to clearly demonstrate that fluvial, tidal and surface water mitigation is required, and what mitigation you are recommending.</p> <p>Suggest wording to make part B clearer.</p> <p>Unless clarification is made to the wording of Part B of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy), feel it is unsound due to it being unclear at what it is seeking to achieve and therefore ineffective.</p> <p>Part C of Policy 8 – No comments to raise.</p> <p>Part D of Policy 8 - Welcomes that Part D has been updated to incorporate fluvial and undefended tidal flood risk as well as just surface water flood risk. Also welcome that it has been updated to reflect that the compensation requirements are not our requirements, but the requirements of policy.</p> <p>However, the first section of Part D references ‘fluvial and surface water flooding’ and the second part references ‘fluvial and undefended tidal flood storage compensation’. The policy should be requesting additional storage for all three sources of flooding, so it is unclear why only certain types are referenced in different parts of the policy. Additionally, whilst the policy mentions fluvial, undefended tidal and surface water flooding, it only references ‘on-site attenuation measures’ which are a way of alleviating surface water flooding, not fluvial or undefended tidal flooding. References paragraph 049 of the Flood</p>

Risk and Coastal Change PPG, that makes it clear that level-for-level compensatory storage is required for fluvial and tidal flooding. Therefore, recommend that the wording is updated to reflect all three sources of flooding and to clarify all appropriate methods of compensation.

Reference their Reg 18 response and the wording 'where feasible'. Recognise that this is not very strong wording, note that it is challenging for developers to provide the minimum required flood storage compensation, let alone go above and beyond this, and therefore the use of 'where feasible' whilst not strong was useful to support discussions with developers to increase flood storage on site. It could be useful to add the requirement for developers to submit evidence to support the assessment of feasibility of providing additional storage on site.

Suggest wording to make part D clearer.

Part E of Policy 8 – Raise that once the wording for Part D is updated to provide clarity on what it is trying to achieve, it is unclear what Part E would deliver above this. Appears that both Parts D and E are trying to secure additional flood storage and attenuation on-site. It is unclear what additional aspects Part E is aiming to secure above Part D.

Seeks clarification of the intent of Part E of Policy 8.

Parts I and J of Policy 8 - Welcome that Part I 3 of Policy 8 – 'Flood Risk and Sustainable Drainage' (Strategic Policy) and the supporting text has been strengthened as recommended in their Regulation 18 consultation response.

Also welcomes that Part I 4 of Policy 8 – 'Flood Risk and Sustainable Drainage' (Strategic Policy) has been strengthened as recommended in their Regulation 18 consultation response, by including reference to not permitting new, and replacing existing, active flood defences with passive flood defences.

Set out that since the Regulation 18 consultation, an updated version of the Thames Estuary 2100 Plan has been published. This includes bringing the first milestone for raising defences forward, from 2065 now to 2050.

Part J of Policy 8 – 'Flood Risk and Sustainable Drainage' (Strategic Policy) states that 'In addition, in line with the requirements of the Thames Estuary 2100 Plan, developments adjoining the River Thames must maintain and where necessary enhance or raise flood defences to the 2065 statutory level as set out in the TE2100 Plan (or show how they could be raised in the future), demonstrating that they will continue to provide adequate flood protection for the lifetime of the development'. Therefore, the date referenced is no longer correct.

Suggest that Part J is updated.

Riverside Strategy Approach - Previously recommended that the Local Plan referenced a Riverside Strategy approach to the redevelopment of riverside areas, to recognise the multiple benefits that can be achieved through flood defence works. Row 724 of the 'Statement of Consultation – Local Plan' (dated June 2023) states 'comments noted'. Are unable to find any reference to a Riverside Strategy in the updated plan. Whilst this does not affect the soundness of the plan, it would have been useful to have greater understanding of the reasons for not including this within the plan.

Highlights row 752 of the 'Statement of Consultation – Local Plan' (dated June 2023) which states that paragraph 16.75 of the Local Plan has been updated to reference the multiple benefits flood defence works can bring. However, is unable to locate this wording within the Regulation 19 Local Plan. Recommends this is rectified in line with the Statement of Consultation.

Part K of Policy 8 - Welcome that the policy is stronger than the Environment Agency's own stance, that is held consistently across the tidal Thames, on basements in tidal flood zones. Welcome that the table formatting errors have been corrected. Also welcome the addition of information regarding basements and flood defences within the table.

Part L of Policy 8 – Sets out that their Regulation 18 Local Plan consultation response noted that whilst it was commendable to require developments to consider a higher climate change allowance than required through the gov.uk guidance, it may be difficult to achieve in practice. Therefore, welcomes the removal of the requirement for all developments to utilise the upper end allowance.

	Points out that Part L now states that 'Submitted FRAs should utilise the 'central' climate change scenarios when implementing the climate change allowances for surface water and fluvial flood risk'. This is contrary to the gov.uk climate change guidance, as depending on the flood zone and the vulnerability classification, developments should utilise different climate change allowances. At present, Part L of the policy suggests that an essential infrastructure development in Flood Zone 3 only needs to consider the central allowance, which is contrary and more lenient than the national guidance. Thinks part L should be updated to reflect the gov.uk climate change allowances guidance, otherwise the policy would be considered unsound.
Rachel Holmes, Environment Agency, 338	Reiterates Regulation 18 comments - where feasible, SuDS should incorporate above ground features that are designed to maximise their ecological and aesthetic value and improve water quality. Any outfalls should be via open flow routes that have minimal impact on the receiving watercourse. We recommend that the policy is updated to reflect these additional requirements. Riverbanks - The requirement for a 16-metre buffer zone from a tidal flood defence and 8 metres for other main rivers should acknowledge the multiple benefits of undeveloped river buffer zones, including the benefits for biodiversity and efforts to achieve objectives under the WFD. Reiterates Regulation 18 comments - there should be an emphasis on working with natural processes to reduce the risk of flooding. Examples include using soft engineering approaches to bank protection works on the River Thames wherever possible, which would provide multiple benefits for flood alleviation, biodiversity and helping watercourses achieve good ecological potential under the requirements of the WFD. Acknowledge that this is referenced within the supporting text however, strongly recommends this is moved into the main policy box of Policy 8. Not only should the local plan encourage the return of engineered riverbanks to a more natural state, but it should also be opposed to new proposals to engineered riverbanks in order to make the policy more effective. Reiterates that the previously suggested text would make this policy more effective. Feels more emphasis is needed on green alternatives for porous surfaces, including but not limited to grass, (native) trees, living walls, living/biodiverse green roofs etc. These not only provide excellent interception and reduced discharge rates but help to filter pollutants from entering the watercourse. This would also have an advantageous impact on Policy 9. Pleased to see references to natural flood management within the evidence base and the requirement for development to be set back.
Rachel Holmes, Environment Agency, 339	Welcomes that Table 16.3 (now 16.4) has clarified the term 'no intensification of land use'.
Rachel Holmes, Environment Agency, 340	Welcomes that the supporting text at paragraph 16.80 includes a reference to Policy 40.
Rachel Holmes, Environment Agency, 341	Welcomes that a reference to the EAs Flood Risk Activity Permit (FRAP) requirements has been included within the supportive text to Policy 8.
Victoria Chase (WSP), The Boathouse Twickenham Ltd, 470	References Policy 8 Part B which outlines that development should provide mitigation and resilience against flood risk and advice should be sought from the EA. Argues that through high-quality, effective design there is an opportunity to deliver design sympathetic to flood risk without compromising the character and openness of an area. The flood issues associated with the existing housing on site will be mitigated through the new scheme building.
Policy 9. Water Resources and Infrastructure (Strategic Policy)	
James Stevens, Home Builders Federation, 342	Argues that Part D of the policy is unsound and unjustified. Feels it is not supported by evidence. Concerned that it requires applicants for residential development to rectify matters that are outside of their control. The policy raises fundamental issues regarding the soundness of the plan as a whole and whether it can be delivered. Applicants for development are not providers of water services, and therefore the requirement of this policy cannot be delivered by applicants. Consequently, the plan as a whole could be unsound if Thames Water is unable to provide developments with water services.

	<p>Feels it is necessary to examine whether the evidence supports the requirements of this policy.</p> <p>Sets out Thames Waters 'Water Resources Management Plan and the Water act 2014 to maintain the water supply system.</p> <p>Concerned that the Council is entering an area governed by a separate statutory regime. It is drawing its own conclusions and making policy on a matter that is contrary to the adopted statutory WRMP. The WRMP 2019 published by Thames Water identifies challenges with water supply (potable water) but the company has identified actions it can take to ensure an adequate supply of water and waste services to support the needs of the planning system. Indeed, if it was unable to do so, it is unlikely the WRMP could have been approved by the Environment Agency and Defra. Indeed, lawfully, the Environment Agency could not have approved the WRMP 2019 if a problem of water supply and sewerage treatment had been identified.</p> <p>Feels the Council is adopting a different view to the one Thames Water reached in 2019 – a conclusion supported by the Environment Agency and Defra.</p> <p>States that the policy is unreasonable as it requires applicants to rectify issues of water services that are beyond their ability to control.</p> <p>Stresses that housebuilders already make payments to water companies to ensure that water companies invest to support the needs of the planning system: three billion pounds have been paid by housebuilders since 1990. This is a requirement of law. To demand that housebuilders make further payments (as Part G could require) is unreasonable.</p> <p>Concern that if Thames Water feel there is insufficient capacity, housebuilders cannot solve the problem of the inadequacy of water infrastructure and services. If the development requirements the Council has identified cannot be delivered owing to the inadequacy of water services then the plan must be unsound: the development needs identified cannot be delivered. Alternatively, the proper weight should be accorded to the statutory WRMP that has been published by Thames Water. This covers a period of 25 years. It identified no major issues of water supply and wastewater treatment. This statutory plan was subsequently approved by the Environment Agency and Defra. The policy should be deleted.</p>
<p>David Wilson, Thames Water, 343</p>	<p>We support Policy 9 and supporting paragraphs 16.97-16.99 as they are generally in accordance with our previous Reg 18 representations. However, we consider that the new text needs to be relocated to the 'Water and Sewage Infrastructure' section of Policy 9.</p> <p>Stresses that water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>Highlights the NPPF requirement for strategic policies to set an overall strategy for water supply and wastewater. Also highlights PPG sections on water supply, wastewater and water quality which sets out that Local Plans should ensure that investment plans of water and sewerage/wastewater companies align with development needs.</p> <p>Supports the section on 'Water and Sewage Infrastructure' in Policy 9 as it is in line with our previous representations.</p> <p>Highlights the guidance in the NPPF, that Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs).</p> <p>Supports Policy 9 Part B as it is in line with previous representations, but consider that this should be located under the 'Water and Sewage Infrastructure' heading.</p> <p>It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Local Plan should therefore seek to ensure that there is adequate wastewater and water supply infrastructure to serve all new developments and support Policy 9 and supporting text in this respect.</p> <p>Set out that Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development.</p>

<p>Rachel Holmes, Environment Agency, 344</p>	<p>Recommend that advice on how the WFD Waterbodies within the borough can achieve good ecological status/potential, via methods such as river restoration projects and soft engineering approaches to bank protection is considered.</p> <p>To make this policy more effective, we recommend that the protection of the boroughs rivers and watercourses is expanded to include further details on bank protection. The use of hard engineering techniques is a specific local issue that we commonly see when responding to planning applications in the borough.</p> <p>Pleased that there is now a requirement for a construction management plan under point C (4) to reduce contamination of surface or ground water, however, this policy would be more effective if this was expanded to include main rivers and watercourses.</p> <p>Water resources and quality – highlights that in their Regulation 19 response they raised that the Local Plan should recognise that The London Borough of Richmond upon Thames has been classified as an area of serious water stress and that there is limited water resource availability, along with demand and supply issues as set out in Water Companies Water Resource Management Plans (WRMP's). They set out in their response that they do not see any mention of this classification within the Local Plan. However, we acknowledge that within the supporting text to Policy 6 in paragraph 16.39, states that the Thames Water region has been designated to be 'seriously' water stressed which we welcome.</p> <p>We note and welcome our comments regarding water infrastructure to support growth has been address as part of the Council's Infrastructure Delivery Plan.</p>
<p>Delivering new homes and an affordable borough for all</p>	
<p>Hannah Bridges, Spelthorne Borough Council, 345</p>	<p>Note that completions (set out in the AMR) suggest that anticipated completions are in excess of the London Plan requirement of 4,110 dwellings over a ten-year period. Furthermore, that the Housing Delivery Test has consistently been met. Interested to understand if this surplus supply has been considered in cross boundary discussions to help address any unmet needs of neighbouring authorities, particularly those of the Greater London area. Recognize that there remains a notable amount of unmet need therefore further work should be undertaken across the wider area to review the implications associated with this and to identify further capacity options to ensure this is met within Greater London.</p> <p>Notes the emphasis on higher density development and smaller units, which is supported but highlights that this could have implications for Surrey, since previous under-delivery in London and lack of affordable family units has added to housing pressures in Surrey districts and boroughs, with potential knock-on impacts on infrastructure.</p> <p>Notes that there are no site allocations proposed in close proximity to the Spelthorne-LBRuT boundary and that there is no additional need to plan for additional gypsy and traveller needs in the Local Plan.</p>
<p>Jonathan Blathwayt, GLA on behalf of Mayor of London, 346</p>	<p>Policy 10A reflects the 10-year housing target, which is welcome, however it is not clear if the borough is actually committing to meet this target by 2028/29 considering any shortfall in the preceding years within the plan period years before 2029. Para 17.7 mentions that 'meeting the higher housing target in the London Plan will be a challenge' which creates confusion if the borough is committed to meeting the 10-year London Plan housing target. Moreover, Table 17.1 doesn't specify the 10-year period of expected completions, so it is not clear if this is 10 years of the plan period or 10 years of the London Plan.</p> <p>Pleased to note that the draft Plan confirms an indicative target of 3,639 homes from 2029 to 2039 based on identified capacity and the small sites figure in accordance with Policy H1 and paragraph 4.1.11 LP2021. However, with the Draft Plan period set to start from adoption further clarity on the total target for housing for the entire Plan period would be beneficial, this should consider any under or over supply in the time between 2018/19 and the Plan adoption date.</p> <p>Support for Policy 12 that seeks to assess applications for older person's housing in accordance with London Plan Policy H13. It is noted from para (17.36) that you have used local evidence that sets the need at 75 homes per year. This is less than half the benchmark of 155 per annum as set out in Table 4.3 of</p>

	LP2021. The Plan should clearly set out how any need for older person's housing is to be met over the Plan period through both specialist housing as well as the general housing stock.
Suzanne Parkes, Elmbridge Borough Council , 347	Request that LBRT continues to take into account Elmbridge's unmet housing need and informs EBC of any opportunities that arise within LBRuT, where EBCs residual housing need, or part of it, could be met.
Policy 10. New Housing (Strategic Policy)	
Duncan McKane, London Borough of Hounslow , 348	Note the findings of the 2023 update of the Local Housing Needs Assessment, and the updated approach to meeting your London Plan housing target and supporting the provision of affordable housing within Policies 10 and 11. Will look to agree positions on meeting housing need through a SoCG.
Tim Catchpole, Mortlake with East Sheen Society , 349	No further comments to raise following responses to Regulation 18 comments.
James Sheppard (CBRE), LGC LTD , 350	Highlights that the Borough continues to suffer from a longstanding under provision of affordable homes. Feels every avenue should be explored to achieve the delivery of affordable homes. This should include for a balanced approach to mixed-use development, whilst ensuring no-net loss of employment floorspace. Concern that one of the key issues that will serve to stifle future affordable housing delivery is that a such a large proportion of the Council's forecast housing delivery stems from the delivery of small sites. Sets out that affordable housing is very often difficult to provide on-site, as part of small site development. This often manifests in Payments in Lieu (PiL). Given the lack of available land to develop new affordable housing, PiL cannot easily and readily contribute to relieving the affordable housing crisis. The comprehensive development of larger sites is a tangible and effective way of delivering on site affordable housing, in locations where affordable housing is most needed. The risk of such a reliance on small sites and PiL, is that this is far less effective than providing strong provision, 'on mass', as part of larger site redevelopment. Notes that the draft Local Plan sets out that there is a need to retain land in employment use but goes on to concede that "there may be limited potential for enabling housing gain on employment land if proposals comply with the requirements of Policies 23 and 24". As stated elsewhere in this consultation response letter, it is strongly considered that draft Policies 23 and 24 should include an allowance for intensification or co-location within LSIS, to provide for a mix of industrial and residential uses, in line with the London Plan. Boroughs should be identifying and seeking to enable additional development capacity to supplement targets, thereby realising the true potential of brownfield housing capacity.
Katherine Drew, The Royal Parks , 351	Reiterates comments made during the Regulation 18 consultation – Concern that development close to the Parks will lead to an intensification of use. Feel some of the value of developments should be captured through S10 or CIL payments.
Philip Villars, PMV Planning Limited on behalf of owner of Arlington Works , 352	Sets out the pressing need for housing in the Borough. References the most recent Authority Monitoring Report – Housing in March 2023, which set out a shortfall in delivered residential units. References the Local Housing Needs (LHN) Assessment published in December 2021, sets out the actual housing need which is additional on top of the London Plan target. Feels the Council should increase its housing target to better align with the LHN figure, ensuring the Plan is informed by the most up to date evidence.
Suzanne Parkes, Elmbridge Borough Council , 353	Notes the London Plan target. Notes the Plan sets out to exceed this. Welcomes this as well as the inclusion of indicative targets in the broad areas of the Borough. Considers that it would be useful if, within each of the allocations, the indicative number of units to be provided is set.

	Notes that an ‘expected implementation timescale’ for each allocation has been added which is considered useful.
James Stevens, Home Builders Federation , 354	<p>Feels the policy is unsound because it is contrary to national and London Policy.</p> <p>Concern that the Plan only sets a housing requirement for ten years, but the London Plan operates over 15 years. London Plan policy does expect boroughs to set requirements for plan periods that extend beyond this. Richmond-upon-Thames is required to provide 4,110 homes by 2028/29. For years that extend beyond this date, the London Plan advises drawing upon evidence of land supply, including evidence in the SHLAA that was produced to support the London Plan, and also rolling-forward the small sites assumption.</p> <p>Feels the Council must clarify its plan period. Assuming the plan will operate for the period 2025 to 2040, it must set a housing requirement for this period. Sets out the housing figures cited in the Local Plan.</p> <p>Feels the average annual housing requirement is currently unclear but it is necessary to define this for monitoring purposes and the calculation of the five-year land supply. It may be 411dpa up to 2028/29 and 306dpa thereafter, but it will depend also on the extent of any backlog, or over-delivery.</p> <p>Raises that the housing trajectory on page 215 only runs up to 2030 / 31. If the Plan is expected to operate for a longer period than this (as is required by the Framework) then the Council should prepare a trajectory for the full plan period.</p> <p>Feels to increase delivery gradually, as illustrated in the trajectory is unsound. The London Plan expects the requirement for 4,110 homes to be delivered by 2028/29. However, we recognise that by the time the plan is adopted – probably in early 2025 – the Council anticipates providing more completions than the annual average rate of 411dpa. In 2024/25 completions are expected to reach 552.</p> <p>A stepped trajectory should not be necessary in the case of Richmond. The housing requirement for Richmond is the second lowest in Greater London. Delivering these homes in an affluent borough where housing need is high, should not be an obstacle, irrespective of the pandemic and current market uncertainty.</p>
Summer Wong (RPS), Notting Hill Genesis , 355	<p>Supports Policy 10’s commitment to exceed the borough’s ten year London Plan housing target of 4,110 homes, particularly the delivery of 900-1,000 units in the Teddington and the Hampton area.</p> <p>Highlights that none of the draft Site Allocations include indicative housing capacities and as such, it is not clear how the Council is proposing to meet the housing target set in Policy 10.</p> <p>Highlights that the proposed development at St Clare Business Park for 100 residential units and replacement commercial floorspace in the Hampton Hill would contribute towards the borough’s housing target.</p>
Councillor Niki Crookdake , Green Party Councillor for Mortlake & Barnes Common, 356	<p>Raises that 1,900-2,100 homes are anticipated in the Local Plan within 1 mile of Chalker’s Corner, however current forecasts are at least 25% higher, with at least 2,800 new homes anticipated to be built in this locality. Concern that the underestimate and the incorrect area identification may have contributed to the lack of infrastructure planning.</p> <p>Suggests a clear summary of the net contribution to the housing stock expected from any developments approved through the year, will enable progress against the targets set out in the Housing Needs Assessment to be tracked more easily, providing improved transparency.</p> <p>Suggests amendments to policy 10.</p>
Smruti Patel (Avison Young), Avanton Richmond Developments LTD , 357	<p>Concern that Policy 10, Part 2 only covers a 10-year period rather than the 15 year plan period.</p> <p>Feels that the 10-year net completions target set by policy H1 of the London Plan should be projected forward. Policy 10 should be amended to plan for a higher housing target to reflect this.</p> <p>Part B of Policy 10 identifies broad locations for growth based on wards. The use of wards is inconsistent with the place-based approach adopted by the first part of the plan. As a consequence, it is not possible to effectively apply Policy 10 and the first part of the plan together, and therefore not possible to read the local plan ‘as a whole’.</p>

	<p>Part B also sets out a quantum of housing for each broad location. These are described as ‘indicative ranges’ and ‘approximate’ figures – terms which are vague and do not firmly commit to delivering the minimum target set by the London Plan.</p> <p>In order to accord with the NPPF, the ‘target’ amounts of new housing for each broad location set out in the table at Part B should be amended to tally with the minimum 10-year housing target, and where possible the 15-year target.</p> <p>No explanation is provided in the draft policy of how the actual target set for each location in the table has been calculated, therefore these are not clearly justified by evidence. To ensure soundness the figures should be clearly evidenced and revised accordingly to reflect the evidence.</p>
<p>Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer, 358</p>	<p>Reiterates comments made during the Regulation 18 consultation – Concerned by the operating period and the housing requirement, exceeding the housing target, housing trajectory and broad locations for growth.</p>
<p>Tim Humphries (Firstplan), William Grant & Sons Ltd, 359</p>	<p>Notes that the draft Local Plan sets out that housing delivery against the borough target is capable of being met without the release of employment land, although there may be limited potential for enabling housing gain on employment land if proposals comply with the requirements of Policies 23 and 24.</p>
<p>Policy 11. Affordable Housing (Strategic Policy)</p>	
<p>James Stevens, Home Builders Federation, 360</p>	<p>Feels this policy is unjustified and in conflict with national policy.</p> <p>Notes that the policy does not follow the threshold approach set out in the London Plan. Concern that the pursuit of 50% will cause fewer homes to be provided overall as schemes are delayed or prevented by viability issues. Feels if the Council adhered to the London Plan approach, this could be avoided.</p> <p>Highlights that the viability evidence demonstrates the difficulty of achieving 50% affordable housing – Recognise that schemes do come forward but that these were completed against a less stringent policy context, without contending with new challenges like biodiversity net gain and zero carbon homes. Also raises that the time expended by applicants in negotiating a viable scheme, tends to militate against a higher rate of completions.</p> <p>Feels the Council will need to do more to support the supply of new homes on small sites. This is a strategic priority for the London Plan. Requiring that half of all habitable rooms are provided as affordable homes on minor developments (nine or fewer homes) is likely to delay or deter more small sites from coming forward.</p> <p>Recommends the Plan is revised to support the threshold approach described in the London Plan.</p>
<p>Jon Rowles, 361</p>	<p>Concern that the Council has a low level of affordable housing and that any extra design requirements added on top of the NPPF will result in even less affordable housing being delivered.</p> <p>Concern about the divergence from the London Plan in using the viability method for assessing the amount of affordable housing a site can deliver. Feels this will result in much smaller amounts being built as RICS surveyors will value land differently in London depending on which method the council uses to assess the viability and thus keeping with the current system will result in higher land prices being used in the calculations and correspondingly fewer affordable houses will be delivered.</p> <p>Notes that the BNP Paribas viability assessment states there will be a 5% cost uplift in construction costs and a 15% increase in operational and embodied carbon due to the council going further than the NPPF on zero carbon. Concerned that these extra requirements will divert development to other areas, not meeting the urgent need for housing.</p>
<p>Natasha Styles (The Planning Bureau Limited), McCarthy</p>	<p>Notes that Policy 11: Affordable Housing, Point A, states that ‘all new housing developments in the Borough should provide at least 50 per cent of the total number of habitable rooms as affordable housing on site’.</p>

<p>& Stone Retirement Lifestyles Ltd, 362</p>	<p>Requiring an ‘at least’ level of affordable housing is inconsistent with the Local Plan and advice within the Councils own LPVA. Disappointed that given the great need for older persons housing (discussed in our response to Policy 12) in the Borough, that the LPVA has not tested the viability of older person’s housing.</p> <p>Feels the Council must ensure that the LPVA is updated to include the older person’s typology of sheltered and extra care housing as a minimum and re-consulted upon.</p> <p>Notes that point G of policy 11 G requires sites that do not deliver 50% affordable housing to be subject to a early, mid and late stage review and for sites that meet the 50% target to have an early stage review.</p> <p>To burden development which has either already committed to delivering 50% affordable housing or has already been found to be not viable at the Local Plan stage with a review mechanism at just 18 months post planning permission is wholly inappropriate and inflexible.</p> <p>It is considered that, given the more challenging viability position that older persons housing has, this means that as currently written, all specialist housing to meet the needs of older people will have to go through the delay and uncertainty of a review mechanism. This will impact on the number of sites coming forward for much needed older persons housing which is already negligible, particularly for the middle market in the Borough.</p> <p>The requirement for a review mechanism at paragraph 17.28 is not supported by any justification, evidence, or process where specific inputs to be included within any review mechanism, could be considered in public examination.</p> <p>Note that Paragraph 17.22 advises that the approach required by London Plan ‘Policy H5: Threshold approach to applications’ is not applicable in the Borough as <i>‘Richmond’s affordable housing need is so great and the Borough has such a limited supply of major sites, using the threshold approach would have a detrimental impact on the Council achieving its goal of providing 50% affordable housing across the Borough.’</i></p> <p>However, the LPVA has shown that many of the variables tested were not viable with the 50% affordable housing target. Setting a more onerous requirement than even the London Plan is not realistic and the total cumulative cost of all relevant policies will undermine deliverability of the plan and will simply require a large amount of planning application to have to be viability tested at the application stage, contrary to PPG.</p> <p>Notes that the Plan states that ‘In London the majority of development is brownfield and does not need to be incentivised, as in many cases the building will only have been made vacant for the sole purpose of re-development, therefore the Vacant Building Credit will not apply’.</p> <p>It does not appear that the London Borough of Richmond have any local evidence to justify the departure from national policy on Vacant Building Credit and therefore Point M should be deleted.</p> <p>The second section of para 7.19 should therefore be deleted as it is inconsistent with NPPF para 64 on vacant building credit and a departure from national policy guidance on planning obligations.</p> <p>All suggested deletions are detailed in the full response.</p>
<p>Neil Henderson (Gerald Eve), Reselton Properties, 363</p>	<p>Reiterates comments made during the Regulation 18 consultation - Considers there should be flexibility in the policy to allow for different tenure splits where the outcome delivers broadly the same social rent quantum but allows for a significantly greater quantum of affordable housing overall.</p>
<p>Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common, 364</p>	<p>Concern that the LHNA identified the growth in 3 and 4 person households and the long waiting lists for affordable family accommodation. In line with national policy, the plan should be based on proportionate evidence, which states a need for 3+ family homes and supported living to, as identified in the LHNA.</p> <p>Raises that a calculation should be carried out which estimates the actual profit a developer expects to make on a scheme, so that this information can be used to inform blended profit negotiations.</p> <p>Suggests wording amendments to Policy 11.</p>

<p>Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer, 365</p>	<p>Evidence of historic (lack of) affordable housing delivery in the borough confirms that a 50% affordable housing policy requirement has failed to deliver adequate amounts of affordable housing in the borough. Further to this, there is no evidence within the Council’s evidence base documents to suggest that this will change if a 50% requirement is continued.</p> <p>Evidence from elsewhere in London indicates that adopting the Mayor’s Threshold Approach at 35% delivers an increase in affordable housing compared to adopting a 50% policy.</p> <p>In any event, there is inadequate viability evidence to justify setting the borough wide affordable housing policy at 50%: All of the proposed site allocations do not correspond with any of the scenarios tested in the Viability Assessment (so there is an evidence void); The majority of the scenarios tested in the Viability Assessment are unviable with 50% affordable housing; The hypothetical scenario of the redevelopment of a retail park is not viable with 50% affordable, however is marginally viable with 35% affordable housing. There is furthermore, no justification provided for restricting access to the viability tested route to exceptional circumstances.</p> <p>On this basis, we consider the overall approach to the policy to be unsound on the grounds of non-conformity with the London Plan (and therefore not in accordance with national policy), it has not been positively prepared, not justified, not effective. It can be made sound by amending the policy to fully conform with London Plan Policy</p>
<p>Smruti Patel (Avison Young), Avanton Richmond Developments LTD, 366</p>	<p>Notes that the current adopted local plan also has a 50% affordable housing provision policy in place, which has failed to deliver the borough’s objectively assessed needs for affordable housing. Affordable housing completions over the current plan period average to 47 units per annum over the period of 2012-2022 (total: 467 units). There is no evidence to suggest that continuing with a similar policy will change affordable housing delivery over the 15-year draft plan period. Accordingly, the policy is not positively prepared, nor likely to be effective. Additionally, it is not justified by the evidence (the Local Plan Viability Assessment). As such, it is incapable of delivering sustainable development and is therefore inconsistent with national policy.</p> <p>The London Plan does not preclude boroughs from bringing forward policies that vary from the detail of the policies in the London Plan where locally-specific circumstances and evidence suggest this would better achieve the objectives of the London Plan and where such an approach can be considered to be in general conformity with the London Plan, no justification has been provided in the draft Plan as to why the LBRuT have deviated from the threshold approach, nor any evidence to suggest that the proposed approach would be successful in delivering the objectively assessed affordable housing need of the LBRuT. The policy is therefore not in general conformity with the London Plan.</p> <p>The LPVA fails to provide an adequate evidence base to justify draft policy 11. Notes that, although the LPVA is dated April 2023, the value and build costs used are based on information up to June 2022. The LPVA therefore cannot be considered to be up-to-date and reflective of market signals and is therefore an unsound evidence base. The price material index has subsequently increased, as such, the draft plan has not been demonstrated to be deliverable.</p> <p>Also notes that the LPVA does not undertake site specific testing for the draft allocation sites, rather it tests a range of development typologies. It also fails to account for differences in gross development value for different typologies.</p> <p>On review of the viability appraisal results, we note that a majority of the development typologies are unviable at 50% affordable housing, particularly where the existing use is residential.</p> <p>Draft policy 11 does not fully account for the recommendation set out by BNP Paribas in the LPVA and rather than retaining a ‘maximum reasonable proportion’ of affordable housing proving, taking site-specific circumstances into account, the 50% threshold is set as the minimum required amount. Concern that viability assessments are only to be accepted for ‘exceptional circumstances’ therefore removing the consideration of site-specific circumstances. Site specific circumstances, particularly of allocated development sites, have not been tested as part of the LPVA and draft policy 11 does not allow them to be considered except for in exceptional circumstances. In conjunction with the variable, and significant, impact of the 50% affordable housing provision on the tested scenarios, it therefore has not been demonstrated that the draft plan, particularly the strategic policy for housing, is deliverable.</p>

	The requirements of part G of the draft policy in regard to viability reviews are not consistent with policy H5 of the London Plan. This risks creating confusion for applicants and decision-makers, and conflicts with paragraph 16(d) of the NPPF. We recommend that it is amended to fully conform with policy H5 of the London Plan to ensure soundness.
Jonathan Blathwayt, GLA on behalf of Mayor of London , 367	<p>Welcomes LBRuTs policy to seek 50% affordable housing from residential development which aligns with Mayor's strategic target of 50% of all new homes to be genuinely affordable as set out in London Plan Policy H4A. However, as mentioned previously, the policy fails to reflect the Mayor's Threshold Approach to affordable housing as set out in Policy H5 LP2021. This means the Publication Draft Local Plan as consulted on is not in General Conformity with the London Plan.</p> <p>Sets out how the threshold approach works and has delivered more affordable housing. Concerned that, in reality, a headline target would achieve less than a more feasible, lower target – in effect 50% of a small number will not deliver our shared ambitions.</p> <p>There is a lack of evidence that the approach as set out in the draft Plan will deliver more affordable homes in practice than the threshold approach as set out in the London Plan has achieved. Therefore, changes to Policy 11 of Richmond's Local Plan should be made to bring it in line with Policy H5</p>
Summer Wong (RPS), Notting Hill Genesis , 368	<p>Feels this draft policy is in conflict with the London Plan Policy H5 which allows for the 35% fast track threshold approach, or 50% on public sector or industrial land. In order to conform with the London Plan, Policy 11 should allow for a viability tested approach, should the affordable housing thresholds not be met.</p> <p>To ensure soundness and that the policy is justified through compliance with the requirement of London Plan Policy H5, it is recommended that Policy 11 is revised to clarify the Council's minimum affordable housing target is 35% on major schemes subject to viability, or 50% affordable housing on public land or industrial land subject to viability and identifying the fast track approach without the need for viability analysis if the scheme is providing at least 35% affordable house and tenure compliant.</p>
Luke Burroughs, Transport Trading Limited Properties Limited (TTLP) , 369	<p>Welcomes policy 11's requirement for development to deliver 50 per cent of the total number of habitable rooms as affordable housing.</p> <p>However, policy H4 (Delivering Affordable Housing) of the London Plan identifies that public sector landowners with agreements with the Mayor can take a portfolio approach to delivering 50% affordable housing across public landholdings in London. TfL has such an agreement with the Mayor which provides the flexibility for more complex sites to come forward where they would be unviable providing the full 50% affordable housing requirement, whilst still providing a high level of affordable housing across all TfL landholdings. The policy should be altered to reflect the above.</p>
Lucy Hale (Gerald Eve), St Mary's University , 370	<p>St Mary's are in support of the position moving forward in respect of student residential accommodation, however there are two points they wish to highlight:</p> <p>Paragraph 8.74 - since the discussions with Iceni, St Mary's have undertaken further work on their projections. The figure of '893' quoted in relation to an on-site capacity increase accounting for demolition, should be '950'.</p> <p>Paragraph 8.85 - It should be made clear that the statement will not apply if the predicted growth in residential provision cannot be contained within existing landholdings with the support of the Council.</p>
Tim Humphries (Firstplan), William Grant & Sons Ltd , 371	Notes that this policy specifically differentiates rates on sites involving former employment land from other sites.
Policy 12. Housing Needs of Different Groups	
James Stevens, Home Builders Federation , 372	<p>Feels the Policy is unsound as it is insufficiently supportive of housing for older people.</p> <p>Sets out the London Plan requirement for boroughs to proactively meet the identified need for older persons accommodation. And the indicative benchmark figure of 155 units of housing for older people per year, feels the Council should include this figure in the policy.</p>

Councillor Niki Crookdake , Green Party Councillor for Mortlake & Barnes Common, 373	As many housing schemes have been reclassified by RPS from supported to independent living as a cost saving initiative, there should be a policy preventing RPs from changing the supported living designation without agreement from the Council. This change would support the LHNA need to retain specialist housing. Ensuring we have sufficient key workers in the borough is essential for delivery of the Local Plan objectives and given the high housing costs in the private sector. In line with national policy, the plan should be based on proportionate evidence, this change, would support whole plan delivery.
Matthew Pigott (Avison Young), Star Land Realty , 374	Object to draft Policy 12 as currently drafted on the basis that it does not conform with the London Plan and there is no evidence to justify a departure. The proposed requirement for all residential uses to contribute to affordable housing is not in line with the London Plan (2021) and we object to the policy as currently drafted. The Plan is supported by an evidence base which has been used to inform the draft policy wording. This includes a Whole Plan Viability Assessment (2023) prepared by BNP Paribas. This assessment does not clearly provide any assessment of the viability implications of draft Policy 12 on care home accommodation or other types of housing needs of different groups. As such, the locally-specific circumstances and evidence required for any departure from the London Plan has not been provided. Local Plan policy should also exclude care homes from the requirement to deliver affordable housing to ensure compliancy and consistency with the London Plan and leading case law. Suggests wording amendments.
Duncan McKane, London Borough of Hounslow , 375	Note the findings of LBRuT's Research on Gypsies and Travellers (updated in 2023) and the policy position articulated at Policy 12 C).
Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer , 376	Reiterates comments made during the Regulation 18 consultation – Issues with the type of residential the policy applies to and the standards of accessible and inclusive design.
Natasha Styles (The Planning Bureau Limited), McCarthy & Stone Retirement Lifestyles Ltd , 377	Given the substantial need, and benefits specialist housing to meet the needs of older people brings, developers of older person's housing schemes should not be required to demonstrate need. In light of the urgent need to significantly increase the delivery of specialist older persons' housing in the Borough and across Greater London, we consider that the Plan should provide a more positive framework to ensure delivery. Point B. should be amended accordingly. Note Point B 2 concerns standards of accessibility and inclusive design. Feels it is not clear if this is suggesting a higher accessibility standard than that required under Policy 13. Highlights that the needs of 'wheelchair users' are often conflated with the needs of older people in the community. Reminds the Council that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the substantial housing needs of older people. Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The viability of specialist housing for older people is more finely balanced than 'general needs' housing. Are strongly of the view that these housing typologies should be robustly assessed through the Local Plan process. However currently the LPVA has not assessed specialist housing to meet the needs for older people. To do so would accord with the typology approach detailed in the PPG.

	<p>Without such a viability assessment and evidence it is difficult for the Council to justify requiring specialist provider to deliver policy requirements to a higher standard than mainstream housing when viability is potentially worse.</p> <p>The Council should ensure that an up to date LPVA is undertaken to inform the future plan. The new viability assessment must include a number of typologies that includes older person’s housing and if older person’s housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the delivery of much needed older persons housing.</p> <p>Suggest the deletion of some text and the amendment of wording.</p>
<p>Policy 13. Housing Mix and Standards</p>	
<p>Rosanna Tunnadine, Habinteg, 378</p>	<p>Habinteg strongly supports this policy and recommends that all new homes meet Building Regulations M4 Category 2 accessible and adaptable standard homes to meet the needs of disabled and older people in Richmond-upon-Thames.</p> <p>In order to address a deficit of wheelchair accessible homes, Habinteg strongly approves that 10% of all new homes meet Part M4 (3) Standard (wheelchair user dwelling) irrespective of being market or affordable dwellings.</p> <p>Habinteg believes that every local plan needs to:</p> <p>Establish clear requirements for a proportion of all new housing to be built to the Building Regulations optional access standards.</p> <p>Specifically name M4(2) and M4(3) standards in its plan with clear percentages of new homes required in each, regardless of whether a regional strategy or plan indicates an overarching requirement or not.</p> <p>We are therefore encouraged to see these standards specifically mentioned in policy 13.E.</p> <p>Recommends consideration be given to including additional wording to emphasise the overall intent of the policy to adequately provide for accessible housing requirements across all tenures and throughout developments. This will help to increase options for a wide range of households who may require accessible properties. References Doncaster Local Plan as a best practise example.</p> <p>Recommends additional wording that is very specific about the scope for exceptions. This can be supported by including wording along the following lines within the planning policy itself for the avoidance of doubt:</p> <p>‘Exceptions to this requirement will only be considered where the applicant can robustly demonstrate with appropriate evidence that site specific factors make the policy unfeasible or unviable. References Doncaster Local Plan as a best practise example.</p> <p>In relation to requirements for wheelchair accessible properties, distinguishing between what regulations require of market homes- M4(3)a) Wheelchair Adaptable standard, as distinct from homes for which the council have referral or nomination responsibility - M4(3)b) Wheelchair Accessible standard is helpful detail for developers. References Reading Local Plan as a best practise example.</p>
<p>Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common, 379</p>	<p>The reference to ‘small units’ and market 2 and 3 bed units does not seem to reflect the priorities identified in the LHNA below, where the identified need was social rent affordable 3 and 4 bed housing and supported housing.</p> <p>With rents forecast to grow, many families and vulnerable people will be priced out of the PRS and will require social rented accommodation. In line with national policy, the plan should be based on proportionate evidence, which would support this change.</p> <p>Provides a table of relevant policies and other evidence.</p> <p>Suggests wording amendments to improve the policy.</p>
<p>Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St</p>	<p>Reiterates comments made during the Regulation 18 consultation – raises issues regarding the likely effectiveness of the policy – clarify the standard referred to is the NDSS, clarify winter gardens can be an appropriate form of amenity on constrained sites to overcome issues of noise and air pollution, and clarify private amenity space relates to the London Plan minimum standards and can be accessed from bedrooms.</p>

George plc and Marks and Spencer, 380	
Policy 14. Loss of Housing – No specific comments received.	
Policy 15. Infill and Backland Development	
Richard Carr, Transport for London (TfL), 381	Welcome removal of the requirement to demonstrate that parking is no longer needed and its replacement with the condition that 'provided any net loss of parking is assessed in accordance with Policies 47 and 48.
James Stevens, Home Builders Federation, 382	Feels that Part A is unsound because it is unjustified and too limiting. Most areas of the borough benefit from access to public transport, and the Council's aims for active travel means that confining development to these Areas of Intensification only is unnecessary. All areas of the borough should be considered suitable, subject to addressing design and historic buildings conservation objectives etc, consistent with the London Plan. Part A 1 of the Policy should be amended, to include the following wording at the end of the point: but all brownfield sites within the borough will be considered favourably, subject to addressing the other requirements of this policy.
Policy 16. Small Sites	
Katherine Drew, The Royal Parks, 383	Reiterates comments made during the Regulation 18 consultation – Concern on the impact either individually or cumulatively on the Parks where small sites are developed in close proximity to the Royal Parks.
Martha Bailey, London Historic Parks and Gardens Trust, 384	Suggests rephrasing of point D 5 to read 'result in no net loss of existing biodiversity, open space or garden land. Where it can be demonstrated that loss of open space is unavoidable, this loss should be offset through the provision of open space elsewhere in the borough, preferably within the development site.'
James Stevens, Home Builders Federation, 385	Concern that the Plan with respect to small sites is unsound because it fails to reflect national and London Plan policy. Sets out both the regional and national policy context for small sites. Do not consider that the aim for net zero homes and 50% affordable housing is conducive to encouraging an increase in the supply of homes from small sites. Feels the Council will need to do more to identify and allocate more small sites as expected by London Plan. This would help to ensure that some of the requirement will be delivered. Reference the Local Housing Availability Assessment, that dates back to 2008 and the GLA SHLAA study from 2017. It is unclear if the Council has been able to identify and allocate any small sites of 0.25ha in size or less, but it should try to do so, to conform to the London Plan. Due to the generally good public transport communications across the borough we feel that that the need to justify small sites where proposals fall outside of PTAL levels 3-6 or 800 metres of a public transport node, or town centre boundary etc is unnecessary and should be dropped. Any small site proposal should be considered favourably and not discounted based on location. Feel that no area of the borough should be placed off limits for the development of small sites. The other objectives of the Plan, including, increasing active travel, the 20-minute neighbourhood, would complement this. Reducing the need for travel complements building in locations further away from transport nodes and town centres. Feels that Map 17.1 omits some sizeable areas of the borough that enjoy good public transport connectivity and have district centres providing services.
Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic	
Claire Wilmot, 386	Feels supporting the local shops is important to retain the areas vibrancy. Would be concerned if parking spaces were reduced, thinks Twickenham suffered badly after this was done. Raises that waste solutions for flats is a problem in the area. Thinks providing large wheelie bins (like other cities have done) would address the issue.

Tim Catchpole, Mortlake with East Sheen Society , 387	No comments to raise on the Councils response to the Regulation 18 representation.
Policy 17. Supporting our Centres and Promoting Culture (Strategic Policy)	
Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer , 388	Reiterates comments made during the Regulation 18 consultation. Argues that Part A of the policy should be amended to include reference to major retail and leisure development also being directed to allocations and to remove the theoretical assumption all new town centre uses should be accommodated in vacant shop units and re-purposing existing retail floorspace does not mean that there is no requirement to allocate sites for major retail development.
Policy 18. Development in Centres	
Tom Clarke, Theatres Trust , 389	Welcomes the support given to Cultural Quarters and the inclusion of theatres in the Cultural quarters in Richmond and Twickenham.
Solomon Green , 390	Concern that the type of shops in sheen centre has changed. Has noticed the closure of specialist shops, shops are either food outlets, charity shops, hairdressers or nail bars.
Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer , 391	Reiterates comments made during the Regulation 18 consultation. Thinks the Local Plan should provide town centre and primary shopping area boundaries, and only defined frontages where they can be justified, to reflect the NPPF and PPG. Part C of the Policy requires major development that generates high levels of trips to be located within a town centre boundary, but this is not consistent with other parts of the Plan, notably the Site Allocation for Kew Retail Park; amend the text to refer to specific allocations. Part F states out of centre development is not considered appropriate in line with the London Plan, but the London Plan does not preclude it; amend the text to refer to where out of centre development involves the replacement of existing out of centre development and/or in accordance with Site Allocations. Part F refers to the sequential test for main town centre uses and impact assessments for retail and leisure, but should refer to proposals outside of defined centres and not in accordance with an up to date development plan; the sequential test should not apply to proposals at Kew Retail Park (or any other retail allocation).
Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer , 392	Also notes that Part C of Policy 18 is potentially inconsistent with Part G. Suggest the following amendments to Part C: Major development and/or development which generate high levels of trips should be located within a town centre boundary, unless justified by Part G.
Olivia Russell (CBRE), Rugby Football Union (RFU) , 393	Concerned that Part C does not acknowledge the high level of trips from attractions such as Twickenham Stadium, and the objective to enhance the existing facilities as supported in Site Allocation 13. LBRuT has confirmed that Policy 18 would not preclude appropriate development at Twickenham Stadium, and Policy 26 (Visitor Economy) is supportive of proposals which support and enhance existing visitor attractions which would include Twickenham Stadium. This clarification is welcomed.
Louise Fluker, The Richmond Society , 394	Feels that the draft plan does not recognise the need for retailers to receive deliveries which in many instances will need to be via vehicle. Also concerned that as more commercial units are converted to residential units without parking provision, these residents will rely on deliveries by couriers. Suggest that wording should be added to the end of the sentence "18.17 Focusing development in the town centres will result in sustainability benefits, including a reduction in the need to travel by car" the words "(accepting that deliveries to retailers and residents will continue to be made by vehicles)".

Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 395	Reiterate comments made at the Regulation 18 consultation - Recommends that the several reports on floor space be updated and co-ordinated and besides assessing the borough estimates that they also provide comprehensive estimates across all future uses for Richmond Town. Also, there needs to be a reliable pre-covid Base year stock take for all uses in Richmond Town - say 2019. At the moment the evidence is piecemeal or missing, notwithstanding our attempts at pulling the data together in this response. Furthermore, we believe it would be unwise to place too much weight on the quantitative estimates of the future. Instead there should be recognition of the uncertainties and risks by applying sensitivity analysis and focussing on planning controls the Council can deploy. We do not believe the estimates are sufficiently robust to support major development at Richmond Station or higher buildings.
Gerard Manley (Firstplan), Baden Prop Limited , 251	Notes part D of the policy. Accept how this policy and its supporting text has been drafted.
Policy 19. Managing the Impacts of Development on Surroundings	
Tom Clarke, Theatres Trust , 396	Supportive, but recommends part A.2 is edited to change reference from 'uses with late night licences' to include cultural and live performance venues. This is necessary to support activities at these venues which occur outside of their licensable activities and can cause disturbance to incoming residential uses. Primarily this would be late night and early morning delivery and removal of sets and equipment necessary to meet the needs of touring productions.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 397	Reiterates comments made at the Regulation 18 consultation - Welcomes the caveat that there is a combined and cumulative impact that needs to be controlled and that amenity of residents needs to be protected. Recommends a greater distinction between the evening and night time economies with the later applying to the late evening early hours of the morning. Opposed to supporting a Night time economy in Richmond Town and on and around Richmond Green due to resident harm and the Riverside due to resident harm including those on the Twickenham riverside. Supports an evening economy but feels the town centre would struggle to host a night time economy due to a lack of public transport past midnight, police and cleansing resources not being available at night time. Notes Policy 19 does enable the Council to limit closing hours of premises. Urges the Local Plan to go further. Night time economy infers activity past 11pm into the early hours of the morning and we would urge the Local Plan to explicitly discourage this in Richmond Town, but of course recognising there may be exceptions. Concern that otherwise residents living in the town centre, Richmond Green, Richmond riverside and Twickenham riverside could be disturbed.
Julie Scurr, 240	Doesn't support the night time economy. Concerned that Richmond has already lost its charm in the evening with large groups gathering on The Green and by the river in the evenings and an increase in anti-social behaviour. Doesn't agree with promoting this further. Should not be considered without first securing a commitment to increased policing with a zero-tolerance of anti-social behaviour. Concerned that "vibrant active uses" which would contribute to the night time economy will create further opportunities for anti social behaviour.
Policy 20. Shops and Serving Essential Needs – No comments received.	
Increasing jobs and helping business to grow and bounce back following the pandemic	
Claire Wilmot, 398	Feels jobs should be encouraged in the right areas. Mentions Udney Park Road and how employment can work in residential areas.
Jon Rowles, 399	Concerned that the council cannot meet its objectively assessed need for office and industrial floorspace. Whilst a reasonable policy response is to strongly protect existing land, feels that the duty to cooperate mechanism could have been used to see if Hounslow, Kingston Upon Thames or Wandsworth could meet some of this unmet demand and see how they can improve transport links any capacity they are able to supply.
Kay Collins (Solve Planning), Port Hampton Estates Limited , 400	<i>Comments on Policies 21, 23 and 24.</i> Support the principles included in policy 21, but argue they need to take account of site specific conditions that may not enable re-provision of employment space or provision for a range of types of commercial units in the way envisaged by these policies. Highlights Platt's Eyot where access arrangements and site conditions mean that the opportunities to provide for a range of uses is more limited. These limitations on some sites should be recognised in these policies or in the site specific text and final policy for Platt's Eyot.

James Sheppard (CBRE), LGC LTD , 401	Understands the broad rationale of protecting employment sites to ensure a sufficient employment land supply across the borough over the plan period. Thinks it is crucial for the Council to further consider how these needs can be accommodated through mixed-use development. Highlights that the potential for co-location of uses on locally important industrial sites is allowed for in the London Plan (Policy E7). Considers that any plan-led co-location of uses can be achieved whilst ensuring that those criteria set out in Policy 7 of the London Plan can be met. Strongly recommends that the employment policies include provision for the co-location of industrial and residential uses as part of the plan-led process, potentially through the intensification of development sites.
Jonathan Blathwayt, GLA on behalf of Mayor of London , 402	Acknowledges that the Employment Land Needs Assessment identifies a need for an additional 60,000sq.m of industrial space for the period from 2019 to 2039. This figure includes the need for both B2 and B8 space aggregated together. Welcomes the breakdown of industrial space need and where/how it is being met as different industrial functions may require different building typologies. <i>See below for comments on Policy 23 and 24.</i>
Duncan McKane, London Borough of Hounslow , 403	Note the findings of the Employment Land & Premises Needs Assessment update (2023) with regards to identified need for office and industrial floorspace. Note the plan approach toward avoiding any net loss in existing office or industrial floorspace whilst supporting new development in appropriate locations (Policies 23 and 24). Highlights that LBH will look to agree positions with LBRUT on meeting employment needs through a Statement of Common Ground (SoCG) in coming months.
Policy 21. Protecting the Local Economy (Strategic Policy)	
Nick Alston (Avison Young), The Offer Group Ltd , 404	Concerned that Policy 21 represents an overly restrictive policy position. Feels it is not justified – The ‘no net loss’ approach does not reflect the conclusions and findings of the Council’s evidence base. Thinks it is not positively prepared – Positive wording is required to effectively manage the significant amount of existing surplus (vacant/available) office floorspace in the borough (as identified in the evidence base). Argues that it is not in accordance with national planning policy – In particular, NPPF para 82(d) and 123 and the requirement to be in general conformity with the London Plan (notes policy E1). As a result of the above, the wording of the policies is not effective. Suggests amendments to draft Policy 21 to ensure its soundness.
Katherine Drew, The Royal Parks , 405	Reiterates comments made during the Regulation 18 consultation – Welcomes the supporting text which sets out that the Royal Parks offer opportunities for economic spin-offs as well as contributing to supporting a high quality and unique environment. Stresses the need to note that any increase in footfall within the Parks is effectively mitigated through policy, to support the work that The Royal Parks does to protect and conserve them.
Summer Wong (RPS), Notting Hill Genesis , 406	Consider Policy 21, that seeks to protect existing employment floorspace for office use, with a no net loss approach, to be inconsistent with NPPF and the London Plan Policy E4. Also concerned that a no net loss approach disregards any site-specific constraints of existing employment sites in Richmond, and the fact that new employment development or mixed-use schemes could have fit-for-purpose new built workspace and the potential to increase employee numbers, and better energy efficiency. Thinks this approach is also contrary to the London Plan Policy E4 which encourages the intensification and consolidation of industrial use with other compatible land uses. Suggests amending Policy 21 to remove the ‘no net loss’ approach to employment floorspace, and adopt the London Plan Policy E4 approach of the retention, enhancement and provision of additional industrial capacity.
Michael Amherst , 407	Sets out that they own a small unit in the Quadrant, but have been unable to let it due to its size and configuration. Thinks the only suitable use would be for it to return to residential.

	<p>Supports the principle of Key Business Areas, but believe that the use of Article 4 to place a blanket ban on conversion of space, including space that is not attractive to tenants and unlettable as office space, is unjustified and goes against national guidelines concerning residential conversion.</p> <p>Feel that any further use of an Article 4 for the Key Business Area should include an exemption for particularly small units. This exemption could be coupled with the existing Class MA of General Permitted Development Order, thereby meaning only units below a certain size and that have been vacant for three months, need be exempted.</p>
James Sheppard (CBRE), LGC LTD , 401	<p>Understands the broad rationale of protecting employment sites to ensure a sufficient employment land supply across the borough over the plan period. Thinks it is crucial for the Council to further consider how these needs can be accommodated through mixed-use development.</p> <p>Feels policy wording for the draft plan should carry with it a degree of flexibility in exceptional circumstances, specifically as part of draft Policy 21.</p> <p>Highlights that the potential for co-location of uses on locally important industrial sites is allowed for in the London Plan (Policy 7).</p> <p>Strongly recommends that the employment policies include provision for the co-location of industrial and residential uses as part of the plan-led process, potentially through the intensification of development sites.</p>
Kay Collins (Solve Planning), Port Hampton Estates Limited ,	<p>Support the principles included in policy 21, but argue they need to take account of site specific conditions that may not enable reprovision of employment space or provision for a range of types of commercial units in the way envisaged by these policies. Highlights Platt's Eyot where access arrangements and site conditions mean that the opportunities to provide for a range of uses is more limited. These limitations on some sites should be recognised in these policies or in the site specific text and final policy for Platt's Eyot.</p>
Peter Thompson, National Physical Laboratory (NPL) , 132	<p>See comment on the Place-based Strategy for Teddington and Hampton Wick, in relation to Policy 21.</p>
Policy 22. Promoting Jobs and our Local Economy	
Katherine Drew, The Royal Parks , 408	<p>Reiterates comments made during the Regulation 18 consultation – Supports protection of the local economy, however is concerned that any increase in numbers of workers in the area could increase football in Richmond and Bushy Parks. Stress that they want to work with the borough Council to ensure that Parks are protected and any additional pressure on them is effectively mitigated.</p>
Policy 23. Offices	
Nick Alston (Avison Young), The Offer Group Ltd , 409	<p>Notes that following the Pandemic there is a need for flexibility when it comes to office space and the need to respond to future changes in demand.</p> <p>Notes that the Employment Land and Premises Needs Assessment says there are high level of vacant and available existing office space in the Borough. The assessment suggests that the Pandemic was not a short-term spike, and instead shows a trend towards higher availability levels.</p> <p>Notes that the assessment supports a shift in approach in the identification of office floorspace need, stating that surplus vacant existing floorspace could be recycled for offices or for other uses.</p> <p>Argues that the evidence base supports a flexible and positively worded planning policy approach to offices, which is at odds with the 'no net less' approach set out in draft Policies 21 and 23. As currently worded, policies 21 and 23 are too restrictive – a position that is not justified by the evidence.</p> <p>Argues that given the current level of availability, and the fact that this availability has in the past 18 months increased rather than decreased, it makes sense to allow for the change of use of offices to other appropriate uses, where appropriate exceptions are met, and suggests policy wording to achieve this.</p> <p>Feel it is necessary for any exception test to be included within the text of the policy. As supporting text, the requirement does not provide sufficient clarity on the Council's approach to decision-making. Indeed the last sentence of paragraph 19.19 states that "provision of marketing in itself does not justify an exception to policy". The policy needs to be clear as to what criteria would comprise an exception to policy, as per the suggested wording.</p>

	<p>Concern that the rigidity of the policy fails to take account of the unique economic characteristics of individual sites and a more positively worded policy, which considers the local market and suitability of the building for office purposes, would enable the Council to properly assess the site for continued office use and then, in turn will allow a more considered discussion on alternative uses. Highlights Burgoine House that continues to remain protected, despite compelling evidence that reusing the vacant building for office accommodation, or its redevelopment for solely employment purposes would be unviable. Argues that the ‘no net loss’ approach to employment floorspace proposed within draft policies 21 and 23, does not align with the London Plan or the NPPF. Suggest that the wording of draft policies 21 and 23 should reflect London Plan policy E1 to allow change of use from offices to other uses where it can be demonstrated through relevant evidence that the existing use is no longer viable or suitable.</p>
<p>Tim Humphries (Firstplan), William Grant & Sons Ltd, 410</p>	<p>Sets out that the allocation of Independence House, 84 Lower Mortlake Road as a Key Business Area is not justified or appropriate. Argues that the Draft Policy 23 ‘Offices’ and its supporting text and Draft Appendix 2, is not justified by the Council’s own Evidence Base and is not in conformity with the NPPF or the London Plan. Raises there is no objective assessment of the building’s significance to the local office market. The significant changes to the office market in the Council’s recent evidence base and long-term vacancy of the building suggest there is no reasonable prospect of use for business purposes. The building should be removed from the KBA designation. There should be more flexibility in Policy 23 to reflect localised demand and the policy should have an appropriate mechanism for release of surplus office accommodation. Provides supporting evidence – a marketing report and a review of the Council’s evidence base.</p>
<p>Gerard Manley (Firstplan), Baden Prop Limited, 411</p>	<p>Do not consider that there is sufficient justification to retain the destination of KBA (albeit changed from KOA) for Westminster House. Feels the designation hasn’t been suitably informed by the available up to date evidence base. Feels there hasn’t been a proper assessment of the current economic output of this building (which is longstanding 66% vacant) and there hasn’t been any acknowledgement of the current available properties (former offices) to let/purchase in the vicinity. Thinks the draft Local Plan should contain justification as to why the entirety of the KBA area has once again been included in this redesignation. Thinks a sound approach would be to undertake a bespoke assessment of each property to be included, and justify such inclusion. Feels this would conclude the Westminster House (and potentially other sites) should not fall within this designation.</p> <p>Concern that the draft policy is more strongly worded and more restrictive than the adopted Policy due to the removal of the mechanism to convert existing offices to other uses with robust and compelling vacancy/marketing information. Considers the stronger wording to not be guided by the most up to date evidence base or by the London Plan. Notes that the supporting text sets out that the provision of marketing evidence would form a material planning consideration in proposing a change of use which isn’t supported by policy. Feel the plan has not been positively prepared. Consider that Policy 23 should be more flexible to reflect specific building requirements and to acknowledge the long-term vacancy of each office unit, as opposed to a blanket restriction for office loss. Feel the plan is not justified. The removal of a mechanism to allow a loss of office floor space subject to the provision of robust marketing information. This removal and subsequent stronger wording is unjustified given the updated data within the 2023 Employment and Premises Needs Assessment. It would be sound to reinstate such a mechanism. Feel the plan is not consistent with National or London policy which seek to protect existing office stock but allow flexibility for conversion to other uses.</p>

Jonathan Blathwayt, GLA on behalf of Mayor of London , 402	Feel that Policy 23's aim to retain existing office space and focus new development into town centres and identified Key Business Areas is aligned with Policy E1 of the London Plan. Paragraph 6.1.4 of the London Plan sets out that office growth locations in outer London should be supported by improvements to public transport as well as walking and cycling connectivity and capacity.
Michael Amherst, 407	<i>Comment raised on Policy 23 in relation to Key Business Areas and the use of Article 4.</i>
James Sheppard (CBRE), LGC LTD , 401	<i>Comment raised on Policy 23. Understands the broad rationale of protecting employment sites to ensure a sufficient employment land supply across the borough over the plan period. Thinks it is crucial for the Council to further consider how these needs can be accommodated through mixed-use development. Feels policy wording for the draft plan should carry with it a degree of flexibility in exceptional circumstances, specifically as part of draft Policy 23. Highlights that the potential for co-location of uses on locally important industrial sites is allowed for in the London Plan (Policy E7). Strongly recommends that the employment policies include provision for the co-location of industrial and residential uses as part of the plan-led process, potentially through the intensification of development sites.</i>
Kay Collins (Solve Planning), Port Hampton Estates Limited , 400	<i>Comments on Policies 21, 23 and 24. Support the principles included in policy 23, but argue they need to take account of site specific conditions that may not enable reprovision of employment space or provision for a range of types of commercial units in the way envisaged by these policies. Highlights Platt's Eyot where access arrangements and site conditions mean that the opportunities to provide for a range of uses is more limited. These limitations on some sites should be recognised in these policies or in the site specific text and final policy for Platt's Eyot.</i>
Policy 24. Industrial Land	
Summer Wong (RPS), Notting Hill Genesis , 412	Feels the 'no net loss' approach is contrary to the London Plan Policy E4 and should be removed and instead should promote net increase where feasible. Sets out that Policy 24 Part B refers to 'affordable light industrial workspace in all major developments over 1,000sqm of employment space and that Policy 25 requires 'affordable workspace'. Highlights that employment development could offer a flexible form of employment other than light industrial use, and light industrial workspace might not be the most appropriate or compatible land use for a mixed-use development. Recommends that Policy 24 Part B) should be removed in its entirety and the affordable workspace requirement will be covered under Policy 25. Sets out the planning history of the St Clare Business Park, feels the site is suitable for development and should be removed from the LSIS designation.
Jonathan Blathwayt, GLA on behalf of Mayor of London , 402	Notes the need for an additional 60,000sqm of industrial space. Would welcome the breakdown of industrial space need and where/how it is being met as different industrial functions may require different building typologies. Feels Policy 24 is aligned with Policy E7 of the London Plan.
James Sheppard (CBRE), LGC LTD , 401	<i>Comment raised on Policy 23. Understands the broad rationale of protecting employment sites to ensure a sufficient employment land supply across the borough over the plan period. Thinks it is crucial for the Council to further consider how these needs can be accommodated through mixed-use development. Feels policy wording for the draft plan should carry with it a degree of flexibility in exceptional circumstances, specifically as part of draft Policy 24. Highlights that the potential for co-location of uses on locally important industrial sites is allowed for in the London Plan (Policy E7). Strongly recommends that the employment policies include provision for the co-location of industrial and residential uses as part of the plan-led process, potentially through the intensification of development sites. Feels Draft Policy 24 allows for little flexibility, constraining the Council's ability to consider high-quality mixed-use schemes that deliver increases, both qualitatively and quantitatively, to employment floorspace, along with other planning and public benefits. Urges the Council to promote more flexible wording through draft Policy 24, that ensures no net loss of industrial floorspace and promotes net increases where feasible. Suggest wording amendments to achieve this.</i>

Kay Collins (Solve Planning), Port Hampton Estates Limited, 400	<i>Comments on Policies 21, 23 and 24.</i> Support the principles included in policy 24, but argue they need to take account of site specific conditions that may not enable re-provision of employment space or provision for a range of types of commercial units in the way envisaged by these policies. Highlights Platt's Eyot where access arrangements and site conditions mean that the opportunities to provide for a range of uses is more limited. These limitations on some sites should be recognised in these policies or in the site specific text and final policy for Platt's Eyot.
Policy 25. Affordable, Flexible and Managed Workspace	
Summer Wong (RPS), Notting Hill Genesis, 413	Feels that in line with the London Plan, Policy 25 should also take into account site specific circumstances and viability information. Thinks wording should be drafted so as to be mindful of competing development constraints and acknowledge that the provision of affordable workspace (or offsite contribution) will be subject to viability. Wording amendments suggested.
Duncan McKane, London Borough of Hounslow, 414	Support the approach to the provision of affordable workspace in Policy 25.
Peter Thompson, National Physical Laboratory (NPL), 415	Think that Policy 25 is an area where NPL can provide input for local benefit. Feels the creation of innovation hubs and R&D incubators and co-location of facilities could benefit all parties. Referenced their current measurement for Business programme. Would welcome the opportunity to discuss how the capabilities of their site in Teddington could support scientific innovation more widely in the area and offer their expertise in discussing the Council's strategies to attract investment into the area.
James Sheppard (CBRE), LGC LTD,	Feels that well considered mixed-use redevelopment proposals would align with the aspiration of Policy 25.
Policy 26. Visitor Economy	
Tom Clarke, Theatres Trust, 416	Support for the Plan's approach to supporting its cultural facilities.
Olivia Russell (CBRE), Rugby Football Union (RFU), 417	Concern that the Regulation 18 and Regulation 19 Plans have both not referenced Twickenham Stadium or its significant role in LBRuT's visitor economy, as a nationally (and indeed internationally) significant sporting venue, and its secondary but essential revenue-generating use as an entertainment venue. Argues that the Plan does not recognize the critical role Twickenham Stadium plays in adding to the viability and vitality of Twickenham town centre either, and should be addressed. Reiterate comments made at Regulation 18 consultation that the Stadium is added to the existing attractions that the Borough will support, promote and enhance. Suggest that Part A of Policy 26 is amended. Acknowledge the response from the Council in the Statement of Consultation (June 2023), but maintain that given the scale and international significance of the Stadium, a specific reference to it should be included within the policy text.
Katherine Drew, The Royal Parks, 418	Reiterate comments made during the Regulation 18 consultation - As important visitor attractions within the Borough, would like to see Richmond and Bushy Parks specifically included within policy 26 in the context of The Royal Parks being supported in providing the necessary infrastructure to support visitor numbers.
Policy 27. Telecommunications and Digital Infrastructure (Strategic Policy)	
Tim Catchpole, Mortlake with East Sheen Society, 419	Reference the comments made during the Regulation 18 consultation. Note the Council's response that it would be unreasonable to make the submission of a photomontage a blanket policy requirement. Feel that planning applications should be understood not just by the officers but by the general public. Photomontages would considerably help the latter, for whom submitted drawings are usually hard to understand.

Peter Thompson, National Physical Laboratory (NPL) , 420	Support the commitment to digital infrastructure in Policy 27.
Louise Fluker, The Richmond Society , 421	Concerned that very tall monopoles (15m-25m) are, in the wrong setting, very obtrusive. Verified visuals would assist the local community in interpreting the effect on the surrounding areas. Suggests the addition of wording to require the provision of verified visuals.
Protecting what is special and improving our areas (Heritage and Culture)	
Claire Wilmot, 422	Raises that The River and the surrounding area should be protected as the borough relies on this area for wildlife, exercise, mental health. Thames Water should not be allowed to destroy it.
Policy 28. Local Character and Design Quality (Strategic Policy)	
Tom Wignall (Avison Young), National Gas , 423	Suggests amendments to Policy 28 to ensure it is consistent with national policy suggesting reference is added to the policy to respecting existing site constraints including utilities.
Tom Wignall (Avison Young), National Grid Electricity Transmission , 424	Suggests amendments to Policy 28 to ensure it is consistent with national policy suggesting reference is added to the policy to respecting existing site constraints including utilities.
Tim Catchpole, Mortlake with East Sheen Society , 425	Acknowledges the Council's response to their regulation 18 consultation comment in respect of gated communities.
Katherine Drew, The Royal Parks , 426	Highlights that the scale and nature of Richmond and Bushy Parks is such that they are considered to be a significant influence on the local character. It is important that development does not threaten their character. As an important component of the Borough's character, the inclusion of the Parks' importance, and reference to their protection, should be included within Policy 28.
Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer , 427	Reiterates comments made during the Regulation 18 consultation – Feels Part B of the Policy is unsound. Recommends wording amendments to make the policy sound.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green) 428	Reiterates comments made during the Regulation 18 consultation – Feels the wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection of designated heritage assets under the provisions of the Planning Act and the National Planning Policy Framework. The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.
Peter Willan and Paul Velluet, Old Deer Park Working Group , 429	Reiterates comments made during the Regulation 18 consultation – Feels the wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection of designated heritage assets under the provisions of the Planning Act and the National Planning Policy Framework. The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.
Policy 29. Designated Heritage Assets	

Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer , 430	Note the revision of Policy 29 since the Regulation 18 version, with the council reducing overly restrictive policies. However, reiterate concerns that Policy 29, does not follow the national planning policy requirement that notes that where a proposal causes harm to a designated heritage asset, such harm should require clear and convincing justification and be outweighed by public benefits (Paragraphs 201 & 202 of the NPPF). Feel that as currently drafted, Policy 29 is not compliant with national planning policy.
Smruti Patel (Avison Young), Avanton Richmond Developments LTD , 431	Consider Policy 29 to be unsound. Paragraphs 201 & 202 of the NPPF state that where a proposed development will cause harm to a designated heritage asset (whether that be substantial or less-than-substantial), clear and convincing justification is required in order to demonstrate that such harm is outweighed by the public benefits of a development proposal. Feel Policy 28 is not compliant with national planning policy. Parts A.4, A.6 A.8 and A.9 are considered too specific, particularly in reference to the requirement to retain and preserve original structures, layouts and architectural features. There is no requirement to, in national planning policy or the London Plan, to reinstate historic features, not least in cases of buildings of multiple periods, as it may not be appropriate to reinstate features of a particular phase of a building's history.
Mark Jopling, Udney Park Playing Fields Trust , 432	Sets out that following public consultation on Conservation Areas for Teddington and Hampton Wick in 2022, the Trust prepared a Draft Conservation Area Appraisal for all of Udney Park, working with a leading Heritage architect and the London Gardens Trust. LBRUT declined to review this draft Appraisal due to resource priorities. In light of the continuing deterioration of amenities at Udney Park, the Trust urges the Council to review the draft Conservation Area Appraisal before the Local Plan Inspection.
Richard Mundy , 317	<i>Concern raised on Policy 3 that the Local Plan discourages cost effective decarbonisation, particularly in conservation areas. Mentions that encouragement should be given to replace single pane windows with double glazing, the installation of solar panels in appropriate directions and allow people to add bike shelters and car chargers in front of their houses.</i>
Policy 30. Non-designated Heritage Assets	
Mark Jopling, Udney Park Playing Fields Trust , 433	Welcomes the recognition of the Udney Park Pavilion as a registered War Memorial and Building of Townscape Merit. Urges the Council to use statutory powers of Enforcement to protect locally-listed Heritage buildings like Udney Park Pavilion.
Martha Bailey, London Historic Parks and Gardens Trust , 434	Notes that there is a table of locally listed buildings available online however, it is not clear where 'locally listed historic parks and gardens' have been collated, asking for clarity on this. Highlights that LPG's inventory of historic open spaces in the Borough may comprise a good starting point.
Smruti Patel (Avison Young), Avanton Richmond Developments LTD , 435	Policy 30 is not consistent with the NPPF, which requires the effect of an application on the significance of a non-designated heritage asset to be taken into account in determining applications. There is no requirement in national legislation or policy to preserve or enhance the significance of non-designated heritage assets.
Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer , 436	Continue to consider Policy 30 unsound as it is inconsistent with national planning policy set out in the NPPF, which requires the effect of an application on the significance of a non-designated heritage asset to be taken into account in determining applications. There is no requirement in national legislation or policy to preserve or enhance the significance of non-designated heritage assets.
Policy 31 Views and Vistas	

Peter Willan and Paul Velluet, Old Deer Park Working Group , 437	Reiterates comments made to the consultation on the draft SPD on Local Views. These supported the continuation of adopted views and proposed new views in the SPD, but sought clarity including on the mapping and viewing locations and view management of a number of views (those relevant to Old Deer Park C5.1 Twickenham Bridge (north-east); C5.2 Twickenham Bridge (south-east); C6.1 Richmond Lock & Weir; C6.2 St Margarets Riverside; C6.3 View of the Great Pagoda St Margarets; G1.1 Kings Observatory, Old Deer Park; G1.2 King's Observatory towards Kew Gardens; G1.3 Kings Observatory towards Richmond Town Centre; and G1.11 Old Deer Park Riverside). A number of new linear and landscape views were proposed – Old Deer Park views landscape, Old Deer Park linear, Twickenham Road Footbridge to St Matthias Church Spire, and Richmond Hill to King’s Observatory Old Deer Park.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 438	Reiterates comments made to the consultation on the draft SPD on Local Views. These refer to Friends of Richmond Green comments – see comment 442 below.
Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer , 439	Continue to consider Policy 31 to be unsound and too prescribed. Feels that the policy does not conform with the London Plan, which states that development should not harm, and should seek to make a positive contribution to, the characteristics and compositions of Strategic Views and their landmark elements. Recommends the policy is redrafted in order to be brought in line with strategic planning policies of the London Plan. Note that reference is now made to the Local Views SPD, which identifies views/ vistas designated as part of the adoption of the Local Plan. Raise concerns that the Local Views SPD fails to provide references to design policies and guidance set out in national policy and guidance, as well as the framework for the identification of views across the capital. It also does not provide development management guidance, which will help ensure their visual interest (including any contribution made by heritage assets to that visual interest). Urge the Council to include this level of detail within the supporting evidence base. Commented on the SPD supporting the principles but raising detailed points about the evidence base and that the Urban Design Study lacks crucial information, and expect a consultation on an updated draft SPD with any further details on view management and assessing the impact on views. Suggested in the SPD response proposed amendments to Policy 31 from their Regulation 18 comments. Comments on the details and lack of information on specific views: G1.14 Kew Bridge (east); G1.15 Strand on the Green; G1.16 Parish Church of St. Anne, Kew Green; H1.1 Chiswick Bridge (west); and G2.1 Victoria Gate, Kew Gardens.
Gary Backler, Friends of the River Crane Environment (FORCE) , 440	Note with regret that despite their previous response, no parts of the River Crane corridor have been included in the views and vistas identified on the Policies Map. Reiterate comments made to the consultation on the draft SPD on Local Views. These supported the inclusion in the SPD of A2.1 view of the Longford River, but deeply concerned that the list of local views may not be sufficient as a tool for managing views and that those not on the list have no merit or value, raising that no part of any view of any public open space along the Crane Valley enjoys any protection. Suggested views from Craneford West Field, Mereway Nature Reserve and Kneller Gardens, from Crane Park throughout its length between Meadway in the east and the A314 in the west, including the view northwest from the A316 overbridge and the view of the Shot Tower and Crane Park Island Nature Reserve, and the view from Little Park towards Pevensy.
Katherine Drew, The Royal Parks , 441	Raise a few errors with formatting: - Sawyer’s Hill E3.3 – the view semi-circle should be twisted anticlockwise so indicates correct directions (N, E and SE mentioned in text – current diagram twisted too far to the south) - White Lodge to Pen Ponds E3.5 – the point location needs to move to the south more in line with the south edge of White Lodge rather than the centre Welcome in the document the inclusion of the following views: Sawyer’s Hill E3.3, white Lodge to Pen Ponds E3.5, Pantile Bridge A4.1, Dean Road footbridge A2.1, Hampton Court Gate A5.8, Lime Avenue A5.9, Chestnut Avenue, Northern Leg A5.10, Water Garden A5.11,

	Commented on the SPD welcomed the SPD and the proposals for additional views to be protected and specifically inclusion of views from the Royal Parks and as managers of the Longford River. Detailed comment on the nature of the view E3.2 from King Henry's Mound in Richmond Park to Petersham Park.
Vivien Harris, Friends of Richmond Green , 442	Reiterates comments made to the consultation on the draft SPD on Local Views. These supported the continuation of adopted views and proposed new views in the SPD, but comment sought clarity including on the mapping and viewing locations and view management of a number of views (C5.4 Richmond Road, East Twickenham; F1.2 Richmond Green; F1.6 Asgill House; F2.1 Church of St Matthias; F1.1 Richmond Terrace, Richmond Hill; and F1.3 Richmond Bridge (north-east)). A number of new townscape, linear and landscape views were proposed – Richmond Little Green, Gatehouse to Old Palace Richmond Green, Old Palace Lane, Twickenham Road Footbridge to St Matthias Church Spire, Richmond Hill towards Richmond Town and from Richmond Park Pembroke Lodge towards Richmond Town.
Tim Catchpole, Mortlake with East Sheen Society , 443	Reiterates comments made to the consultation on the draft SPD on Local Views. These commented the SPD is well crafted, but raised general comments seeking clarification on the adopted Policies Map, comments on the boroughwide map, and raising concern about riverside views and the relationship with Hounslow and Kingston. Noting a number of views within the historic parish, would like to see a number of additional views included – a number around the Stag Brewery site, a view along Lower Richmond Road, across Jubilee Gardens in Mortlake, along Church Path to St Mary's Church in Mortlake, from Richmond Park to the Alton Estate, and from plateau east of White Lodge.
Henry Brown (The Planning Lab), Royal Botanic Gardens Kew , 444	Reference the comments they made to the consultation on the draft SPD on Local Views. Request clarification and reassurance that a future version of the SPD will be made available for review prior to its adoption. Seeks clarification on how the identified views have been assessed. Although an evidence base is referred to - including work undertaken by Arup to inform the SPD – the methodology relating to views analysis does not appear to form part of Arup's Urban Design Study (2023). Concerned that the lack of detail about the views included in the Plan (and the supporting Urban Design Study and Local Views SPD documents), for example in terms of a description of the visual amenity or development management guidance, might lead to inappropriate development that negatively impacts the Kew Gardens WHS. RBGK would also like to understand the next steps for the draft Local Views SPD and how LBRuT intends to respond to the comments received during the most recent consultation in Summer 2022. In their SPD response, generally supportive of the SPD although suggests stronger links to the RBGK WHS Management Plan, and raised detailed comments on: G1.13 Kew Gardens and Riverside, Kew Bridge; G1.16 Kew Gardens and Riverside, Parish Church of St Anne, Kew Green; G2.2 Kew Road towards the Great Pagoda; G1.4 Pagoda Vista, Kew Gardens; G1.5 Syon Vista, Kew Gardens; G1.9 (former) St George's Church, Old Brentford; and G2.1 Victoria Gate, Kew Gardens.
Policy 32. Royal Botanic Gardens, Kew World Heritage Site	
Jonathan Blathwayt, GLA on behalf of Mayor of London , 445	As mentioned in the Regulation 18 response, the wording of Policy 32 should state that all developments with the potential to impact on the WHS or its setting should be required to be supported by Heritage Impact Assessment. This should be moved from para 20.52 into the main body of the Policy.
Tim Brennan, Historic England , 446	Support the objective of Policy 32 to protect, conserve, promote and enhance the World Heritage Site. Recommends that the reference to the Outstanding Universal Value (OUV) should be within the main body of clause A to make clear that this is the central purpose of the policy. This would align with policy HC2 which requires development plans to conserve and actively protect the OUV of world heritage sites. Reiterates previous comments made during the Regulation 18 consultation – policy 32 should make clear that development proposals that would have an impact on the WHS will require a Heritage Impact Assessment upon application.

Duncan McKane, London Borough of Hounslow , 447	References extensive engagement between LBH, LBRuT and the Royal Botanic Gardens, Kew – specifically the impact of tall buildings in the Brentford area upon the UNESCO World Heritage Site at Royal Botanic Gardens, Kew. Welcomes further engagement on these matters to ensure all potential cross boundary impacts are considered.
Henry Brown (The Planning Lab), Royal Botanic Gardens Kew , 448	References their Regulation 18 consultation response which requested some amendments to the text of Policy 32. Does not feel that the wording of the policy allows for sufficient flexibility to carefully balance the needs of conservation, access, the interests of our visitors and the local community, and sustainable economic use and operation of the site, in order to effectively manage the WHS for the future in the consideration of future development proposals. Reiterates previous comments made during the Regulation 18 consultation – Suggests an additional point is added under Part A of Policy 32.
Policy 33. Archaeology	
Increasing biodiversity and the quality of our green and blue spaces, and greening the borough	
Claire Wilmot , 449	Protection of the green spaces in the borough are imperative. References Udney Park Playing fields and the river as being at risk.
Claire Wilmot , 450	Supports some measure in the Plan – Protecting most of the Green Belt and Metropolitan Open Land and designating more areas as SINC's – Feels there is more work to be done before the Plan can be adopted.
Jon Rowles , 451	Green Grid Area GGa10 River Colne and Crane policies are not reflected fully in the policies in the Richmond Local Plan, and the council should be looking at how it can support the London Plan's ambition to create a new metropolitan scale park (Policy 5.162). Several of the site allocations, Harlequins/Kneller Hall/Sainsbury St Clares/Twickenham Stadium are next to the policy area and should reference them.
Peter Thompson, National Physical Laboratory (NPL) , 452	Reference their ESG Directorate's work on our direct Environment including the ongoing maintenance of our own green spaces, Bushy House gardens and initiatives such as 'no mow May'. Are committed to this and hear how important it is to our employees. Would like to hear more about the council plans in this area and how we may contribute further.
Rachel Holmes, Environment Agency , 453	Stresses the importance of ecological networks, of linked habitat corridors (both within the Borough and linking to adjacent Boroughs) to allow the movement of species between suitable habitats, and to promote the expansion of biodiversity is defined in the National Planning Policy Framework and the Local Nature Recovery Strategy commitment of the government's 25-year Environment Plan and enacted by the Environment Act 2021. The connectivity of Local Wildlife Sites and other designated sites should not be disrupted through the allocation of sites for development and should aim to promote further connectivity of the ecological blue and green network through habitat creation and improvement. A numerical commitment to biodiversity net gain is required in order to be in line with the Environment Act 2021 and should be realised equally in both terrestrial and aquatic habitats using the Natural England Biodiversity and Rivers Metrics. Development sites should not encroach on any watercourse and we urge a minimum 16m buffer zone to development proposals that contain or are adjacent to the Thames and explore opportunities for river restoration enhancements and biodiversity net gain through planning. The reparation or replacement of existing flood defences and/or creation of setback flood defences, every opportunity for ecological betterment should be a requirement rather than an aspiration of new development. Ecological terracing to provide fish refuge and wading bird forage should be at the forefront of considerations. Improved fish/eel refuge should again be prioritised with new pontoons or structures within the watercourse. We would wish to see a policy commitment to actively pursue these aims. Where the watercourse is toe-boarded or engineered, policies should consider opportunities for removal and restoration to a more natural state. References Paragraph 185 of the NPPF which states that planning policies and decisions should 'limit the impact of light pollution from artificial light on ... dark landscapes and nature conservation.' Urges appropriate lighting design in line with best practice guidance set out by the Bat Conservation Trust.

	<p>As an informative point, policies should take into consideration the use of SuDS and Natural Flood Management measures for flow attenuation, filtration, and water conservation.</p> <p>Provide comments on several policy units relating to biodiversity. Whilst the following recommendations for each policy do not affect the soundness of the plan, they could strengthen each respective policy and the overall the Local Plan.</p>
Michael Atkins, Port of London Authority (PLA), 5	Have no further comments to make, considers the Local Plan sound.
Policy 34. Green and Blue Infrastructure (Strategic Policy)	
Rachel Holmes, Environment Agency, 454	Pleased to see their comments to the Regulation 18 consultation have been incorporated into this policy.
Mark Jopling, Udney Park Playing Fields Trust, 455	Reference the importance of Udney Park to the local ecology network. Supportive of the Council maintaining the importance of Udney Park in Nature Conservation and the potential of Udney Park with regards to the provision of green space for public amenity.
Martha Bailey, London Historic Parks and Gardens Trust, 456	Within Part B of Policy 34, suggests an additional point – ‘Seek opportunities to create new, green open space’.
Katherine Drew, The Royal Parks, 457	Reiterates comments made during the Regulation 18 consultation – Seeking specific reference to the role of green infrastructure in reducing recreational impacts on sites such as Richmond Park within the policy text.
Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	
Mark Jopling, Udney Park Playing Fields Trust, 458	Welcomes the introduction of a Local Green Space policy to the Local Plan in 21.18 and that Udney Park maintains the status of Local Green Space.
Solomon Green, 459	Raise that Fulwell 1938 Green Belt land is not mentioned.
John Sadler, CPRE London, 460	Welcome the commitment to protecting the borough’s Green Belt and maintain its current boundaries. Reference their support for the commitments to combating climate change and the proposed designation of six new sites as Local Green Space.
John Sadler, CPRE London, 461	<p>Concerned that the wording of Policy 35 is not consistent with the NPPF – Suggests that MOL has policy goals, therefore leaving MOL in the borough open to threat from development.</p> <p>21.31 seeks to improve the provision of public open space. Suggest that the area of land at Heathfield Recreation Ground, which was proposed for a school site should be added back in and given protected status.</p> <p>The matrix of land that includes David Lloyd, Fulwell Golf Course, Twickenham Golf Course and Squires should be designated as planning Green Belt as it currently has 1938 Green Belt designation but only the golf courses are designated as MOL.</p> <p>Feels a clear policy should be introduced to turn streets into parks in areas of deficiency. More needs to be done to turn ‘grey space’ to green space or community open space.</p>
David Wilson, Thames Water, 462	<p>Set out that Hampton WTW is located in the Green Belt and that as it is one of the largest operational WTW there is likely to be a requirement for upgrades to support growth. Considers that the opportunity should be taken to remove the site from the Green Belt to help facilitate development which will be necessary to support growth in the Borough.</p> <p>Hampton WTW was previously identified as an existing Major Developed site in the Green Belt in a previous adopted development plan in accordance with the former Planning Policy Guidance Note 2 on Green Belts. However, PPG2 was removed with the publication of the NPPF which does not include provision</p>

	<p>for the designation of Major Developed Sites in the Green Belt. The Council did not therefore agree to designate Hampton WTW as an existing Major Developed Site in the current Local Plan in line with the NPPF.</p> <p>Set out the importance of the WTW - is Thames Water’s second largest works and is of strategic importance for London’s water supply. It will be inevitable that further upgrades will be required over the plan period to increase capacity to meet growth being proposed in the London Plan and Local Plans or meet new treatment standards.</p> <p>Given that the WTW is essential infrastructure it is considered that there are exceptional circumstances to remove the Hampton WTW from Green Belt designation in accordance with Policy G2 of the London Plan 2021.</p> <p>Given that the WTW site is existing developed site with built development and infrastructure on which further development will be required in the future in order to facilitate sustainable development within the borough and surrounding area, the site is not considered to align with the purposes of the Green Belt set out in Paragraph 134. Considers that the opportunity should be taken to remove the Hampton WTW from the Green Belt.</p> <p>Disagree with the findings of the Green Belt, MOL, LGS and OOLTI Review undertaken as evidence base for the Local Plan and consider the site does not perform strongly in Green Belt terms. The Green Belt review is unclear as to which settlement sprawl is being referred to as the River Thames separates Molesey and Hampton and this part of Green Belt is not strategic in the whole parcel. The assessment of the entire parcel is flawed as it includes a number of different characters which perform differently against the Green Belt functions. To assume all of the land, including buildings and physical infrastructure is ‘high performing’ Green Belt is clearly flawed. Concludes that the site should be removed from the Green Belt.</p>
<p>David Taylor, 463</p>	<p>Refers to land adjacent to Sunnyside reservoir, Hampton.</p> <p>Feels that this parcel of land does not meet the NPPF criteria to justify its current designation as Green Belt.</p> <p>Highlights that this statement is without prejudice to their Judicial Review claim that this land has never been lawfully designated as Green Belt.</p> <p>It is unsound to retain the land within the Green Belt and it should be removed.</p> <p>The GB designation of this parcel of land should be removed from the Local Plan Proposals Map.</p> <p>Feels a note should be added to Policy ENV4 that <i>'The dog-leg' pocket of land lying between the western embankment of the 'west' Sunnyside reservoir and the eastern extremity of Spelthorne's administrative boundary is not designated as Green Belt'</i>.</p>
<p>Olivia Russell (CBRE), Rugby Football Union (RFU), 464</p>	<p>Consider the continued designation of the eastern strip of MOL parcel no. 36 (Kneller Chase Bridge), which encroaches within Twickenham Stadium, is not justified. The continued designation is not based on a robust and credible evidence base, as it does not respond to conclusions and recommendations within the relevant evidence base document (Open Land Review 2021 and MOL Annex Report 2021).</p> <p>Feel its continued designation is not justified and that the Council's response to the RFU's Regulation 18 representations on this point within the Statement of Consultation (June 2023) is not satisfactory.</p> <p>References their regulation 18 comments – London Plan Policy G3 states that alterations to MOL boundaries should be undertaken through the Local Plan process, when fully evidenced and justified. In the case of LBRuT, this was done through the MOL Review Annex Report.</p> <p>As highlighted in the Regulation 18 representations, the MOL Review Annex Report evidences and justifies the de-designation of the eastern edge of the parcel, in accordance with London Plan Policy G3, as it meets none of the criteria highlighted in LP Policy G3.</p> <p>Query what the planning factors referenced in the Council’s response to their Regulation 18 submission are which balance against this assessment which formed part of the new Local Plan Evidence Base, which clearly confirms this part of the MOL does not warrant its designation, and does not have any public value.</p> <p>Continue to request that, in accordance with London Plan Policy G3, the MOL designation is updated to properly reflect the Review’s findings by removing the strip of MOL within the Stadium boundary, as it meets none of the MOL criteria. Associated amendments to the Proposals Map should also be made.</p>

	<p>Continue to request that the Site Allocation (p.75-78) is reworded, to remove the reference to MOL following de-designation through the Local Plan process. Suggests proposed wording.</p> <p>Also thinks Policy 35 needs rewording. Suggests new wording to reference Policies Map changes to remove MOL on this site.</p>
Jonathan Blathwayt, GLA on behalf of Mayor of London , 465	<p>Supports the strong protection of the Green Belt in accordance with policies G2 and G3 of the London Plan and that you are not proposing any Green Belt for release as set out in the recommendations of the Borough's Open Land Review 2021.</p> <p>Reference that the study identified the majority of MOL within Richmond to be performing strongly, but that there were specific sites that scored weakly against MOL criteria and so are suggested for removal – Sainsburys carpark, Hampton and two areas consisting of front gardens (mentioned in Policy 35). Part C of Policy G3 LP2021 sets out that any alterations to the boundary of MOL should only be changed in exceptional circumstances when this is fully evidenced and justified and through the Local Plan process as Richmond is doing.</p> <p>As none of the three sites appear to meet the criteria for inclusion as MOL, the Mayor raises no objection to the proposed release of these sites.</p>
Lucy Hale (Gerald Eve), St Mary's University , 466	<p>Policy 35 acknowledges that there are forms of appropriate uses within the MOL. Sets out that the Teddington Lock campus is largely covered by an MOL designation, which includes the outdoor sports pitches but excludes the two storey education and sports facility building to the east. Outdoor recreation and sport is an appropriate use, however the policy and supporting text is silent on facilities associated, and ancillary, to outdoor recreation and sport. Support further clarity around this point in the policy and supporting text and believe it would be beneficial in respect of a clearer understanding of the parameters for future growth and the enhancement of the facilities on both the Teddington Lock campus and also the main Strawberry Hill campus. Suggest amendments to the wording of Policy 35.</p>
Rachel Holmes, Environment Agency , 467	<p>Recommends that the use of greener approaches to communal spaces are employed. Reference previous development that has favoured large areas of impermeable hardstanding with a lack of greening of the river edge. There needs to be a paradigm shift in approach as the use of greener approaches to communal open space not only address policy 9 and 10 but ensures less carbon impact through construction.</p>
Rosalind Gall (Solve Planning) on behalf of Magda Wilson, Chantry Securities Ltd , 468	<p>Concerned that the MOL boundary on the Regulation 19 Policies Map is inaccurate in relation to 141 Uxbridge Road, Hampton.</p> <p>Believe the error in the MOL boundary stems from the wrong line for the freebord boundary being taken from the map attached to the license. This error has then been repeated. Attach maps showing the correct and incorrect freeboard boundary lines.</p> <p>Feels that the MOL boundary was unintentional in that as drawn, it's inconsistent, illogical and unjustified. As part of the Local Plan process this error can be corrected.</p> <p>References Policy G3 of the London Plan and sets out that the site forms part of the built-up area and has done for decades. There is no public access to the site, and it provides no open-air facilities. It contains no landscape features and does not form part of a strategic corridor, node or link in the network of green infrastructure. It does clearly adjoin a strategic corridor, however the boundary to this is clearly defined by the Royal Park land and does not include the private car parking of the proposal site.</p> <p>Feel the sliver of land that has been included in the MOL boundary in error should be corrected.</p>
Thomas Rumble (Woolf Bond Planning), Sulinder Singh , 469	<p>Proposes an amendment to the MOL boundary at 56 Heathside, Whitton to enable a more justified and effective Local Plan Policies Map.</p> <p>The existing and proposed MOL boundary divides the dwelling of 56 Heathside and its rear garden from its side garden and associated access point (to the east of the dwelling and within the MOL). The current MOL boundary is not defined by any landscaping. It is instead 56 Heathside's curtilage boundary on the site's eastern side (adjacent to the cemetery) that defines a physical and recognisable boundary between the publicly accessible large cemetery and the private garden serving 56 Heathside. This arrangement has existed for a number of decades and represents an anomaly in the definition of the MOL boundary by artificially dividing 56 Heathside's garden area.</p>

	<p>Refers to Enfield and Waltham Forest who have, following a review of MOL, identified and addressed past cartographical inconsistencies and made minor boundary amendments.</p> <p>Feels the proposed amendment would be consistent with the NPPF in defining the boundary clearly using a physical feature that is readily recognisable and likely to be permanent.</p> <p>Feel the amendment would ensure the MOL would focus upon an open area serving a public recreational and cultural activity only (namely the cemetery use) (thus passing criterion 2 of LP G3). The revised MOL boundary would contain the landscape of metropolitan value (namely the cemetery), without including land that is not of national or metropolitan value (such as garden land) (thus passing criterion 3 of LP G3). Finally, the revised boundary would include only strategic corridors of green infrastructure (forming the cemetery) rather than private garden land (thus passing criterion 4 of LP G3). It is noted that a similar anomaly albeit covering a smaller strip of land (now defined by a backland style residential dwelling and carport) exists on the opposite side of Heathside at No. 65. Logically the same amendment could be made in this location.</p> <p>In the absence of the proposed amendment to the Policies Map, the plan as drafted fails to form the most appropriate strategy taking into account the reasonable alternative of making appropriate minor MOL boundary adjustments such as the one detailed. It is therefore neither justified or effective when considered against the tests of soundness. Further, the approach is inconsistent with national policy, in particular NPPF paragraph 143 that requires plan makers to define boundaries using a physical feature that is readily recognisable and likely to be permanent. On this basis, the proposed amendment to the Policies Map forms a necessary change having regard to the tests of soundness.</p> <p>Would welcome engagement with the Council in advance of submission of the plan to enable this minor adjustment to be made and agreed prior to the examination.</p>
<p>Victoria Chase (WSP), The Boathouse Twickenham Ltd, 470</p>	<p>Concerned with the evidence base and the validity: The evidence base used to inform the policies within this emerging, Regulation 19 version Local Plan is not accurate and takes a “blanket” and generalised approach to defining the quality of the MOL and MOL boundaries. There is a lack of flexibility in the boundaries proposed. The undermining of The Boathouse and Ranelagh Drive as a “minor road and one dwelling” and the conclusion that the “Built development is generally absent” is one that is generalised view. Whilst we do recognise there are areas of the parcel that positively contribute to the MOL and should be retained we also believe that the site is part of the built-up area that does not contribute to the MOL and therefore, should be released.</p> <p>Concerned by the approach to the MOL and The Boathouse: The character of Martineau Drive and The Boathouse is defined by the existing residential form and uses. Draft Policy 35, emphasises that consideration will be made to character, local distinctiveness and openness of the MOL. The Boathouse is more akin to the character and local distinctiveness of the residential setting of Martineau Drive opposed to that of the MOL and therefore, should be released from the MOL.</p> <p>Concerned by the restrictive Policy and the impact on housing delivery: The housing policy and MOL policy in the case of The Boathouse and other residential uses in the MOL are counterproductive to one another. The housing policy sets out the need for housing and the Council’s opposition to the loss of housing whilst the MOL policies set out the need for more sympathetic uses, none of which are residential. The Boathouse would deliver a development in line with the housing policy needs whilst requiring a non residential use would be against the housing policy requirements.</p> <p>Concerned with flooding and Design: Design policies within the emerging Local Plan should provide detail on the important role in recognising the role design plays in providing development that mitigates and provides resilience to flood risk. The importance on consulting the EA and adopting the design measures proposed by the EA should be acknowledged within both Flood and Design policies.</p> <p>Have serious concerns over the justification for and implications of the proposed MOL strategy and MOL boundaries. The Council’s approach to the MOL is based on an inaccurate report and a generalised analysis of MOL land. Dispute that this approach allows for the retention of quality MOL. When viewed in context with other policy requirements and the inaccurate description and limited criterion assessment of MOL, the approach will act as a deterrent to</p>

	<p>suitable and beneficial development and actually creates further obstacles for residential developments unnecessarily included within the MOL, as opposed to promoting the delivery of identified residential housing need and the need for high quality housing. Are of the view that our client's property, The Boathouse, should be removed from the MOL boundary.</p>
<p>John Sadler, CPRE London, 471</p>	<p>Oppose the de-designation of MOL parcels comprising front gardens to residential properties along Hampton Court Road. This is part of the network of historical sites linked to Hampton Court Palace. The relationship between Hampton Court Palace and the buildings around the green is an important relationship which has been lost in many other places by incremental change. The MOL designation of the gardens has helped to maintain this historic landscape. The gardens are also part of a wider green chain, and the designation helps to protect its integrity. The site could also become part of a future World Heritage site centring on Hampton Court Palace and more could be done at the same time to try and gain this status.</p>
<p>Jane Lovell, 472</p>	<p>Refers to Land to the North of Chertsey Road forming a garden for 52 Orchard Road, Twickenham. The site is designated on the LB Richmond proposals map as Metropolitan Open Land (MOL). The River Crane, which runs along the eastern boundary, is also designated as Metropolitan Open Land but in contrast to my garden, in all of the neighbouring properties the designation is confined to the riverbank and has not encompassed any of these gardens sharing the same characteristics. This is not only the case for my immediate neighbours, but applies to the whole of the properties along that stretch of river from 52 Orchard Road travelling north to Railshead Road. Feels that their garden does not meet the criteria set out in Policy G3 of the London Plan for MOL designation. Feels the garden in question does not and cannot fulfil any of the benefits referenced in Policy G3 and does not warrant the MOL status. Feel as this piece of land is a private garden it is not suitable for designation as MOL. Sets out how the private garden has been misrepresented in ARUPs review report. Together with their inaccurate conclusion, do not demonstrate soundness and legality. It also calls into question the Borough's assertion that this review was carried out with objectivity. Highlights past planning decisions that contradict the stated aim of protecting MOL and erode the justification for the retention of the designation of the garden as a whole. Questions the soundness/legality of the Plan including - the non-conformity with the London Plan; NPPF Policy; the Council's stated policies within the Draft Local Plan; the flawed Arup Review and the contradictory treatment of planning adjacent to MOL, it is my belief that in its current state, the Draft Local Plan is neither sound nor legal. Also does not view the plan as being positively prepared, justified, effective or consistent with national policy.</p>
<p>Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 473</p>	<p>Disappointed that the Council did not respond positively to their previous representation. Reiterate previous comments made during the Regulation 18 consultation – On the MOL status of Richmond Green, Riverside North of Richmond Bridge and Riverside South of Richmond Bridge.</p>
<p>Peter Willan and Paul Velluet, Old Deer Park Working Group, 474</p>	<p>Disappointed that the Council did not respond positively to their previous representation. Reiterate previous comments made during the Regulation 18 consultation – MOL status and boundary anomalies and seek to remove any question of an important part of the Old Deer Park ceasing to be designated as MOL.</p>
<p>Saffron Frost (Savills), Melliss Ave Devco Limited (in Administration) c/o RSM, 282</p>	<p>Concerned that the site vision in Site Allocation 32 for Kew Biothane Plant, Mellis Avenue is inconsistent with Policy 35 Green Belt, Metropolitan Open Land and Local Green Space.</p>
<p>Policy 36. Other Open Land of Townscape Importance (OOLTI)</p>	

Mark Jopling, Udney Park Playing Fields Trust , 475	Welcomes the retention of Udney Park. Requests that the Council commits in the Local Plan to enforce maintenance requirements on owners where a lack of maintenance decreases community amenity.
Policy 37. Public Open Space, Play, Sport and Recreation	
John Sadler, CPRE London , 476	Feel the Council could demonstrate greater ambition for increasing the amount of green space in Richmond especially as an increase in population could leave residents with inadequate provision of green and communal open space. Stress the need to reduce the recreational pressure on Richmond Park which is a SAR due to the importance of stag beetles. Recommend looking at how other parks and green spaces nearby can be improved to divert some of the visitors. New parks could be created by converting grey space into street parks.
Martha Bailey, London Historic Parks and Gardens Trust , 477	Feels Point B 1) should be removed - The borough experiences widespread Public Open Space Deficiency. It is therefore highly unlikely that open space/land/playing fields within the borough are 'surplus to requirements.' At a minimum, please change the word 'or' at the end of this policy to 'and' - to ensure that any loss is replaced by better provision elsewhere. Feels Point D 1) should have 'open space, green wherever possible' added. Feels Point D 3) should have 'green' added. Tracked changes are shown in schedule of comments.
Jo Edwards, Sport England , 478	Supports the policy and consistency of wording with National policy and the London Plan. Raises that in Part 8 of Point D, there may be instances where on-site provision is not feasible, practicable or appropriate. Sport England supports the use of CUAs and financial contributions. It would be useful to identify the basis on which contributions will be sought, e.g. through the use of Sport England's Playing Pitch Calculator to which the Council can gain access on request to us. Tracked changes are shown in the schedule of comments.
Lucy Hale (Gerald Eve), St Mary's University , 479	Supports the wording included in Draft Policy 37 in respect of the improving and enhancing existing sport facilities and the future growth and development of the University.
Tim Catchpole, Mortlake with East Sheen Society , 480	Links the comments they have made on Map 20.1 under Policy 31 [See comment 443] to policy 37. Feel that the map should show the edges of the neighbouring boroughs which have open spaces and playing fields used by residents of the Borough. Highlights East Sheen as being an area that has suffered due to closures of sport facilities in Roehampton. Highlight that it is important that the Borough-wide playing pitch strategy (2023) is taken into account.
Jon Rowles, 481	Feels the Open Space evidence report does not conform with London Plan guidance. The published version has omitted the quality scores of each park and the companion guidance needed to fully interpret the report has not been published.
Mark Jopling, Udney Park Playing Fields Trust , 482	Welcomes that Udney Park retains status as a "Key Site". Raises that the draft Local Plan should be revised to recognise this potential for Udney Park to provide increased community amenity as a "Hub Site" under an ACV-compliant ownership structure. Raise that they would like the opportunity to comment on the new playing pitch strategy.
Policy 38. Urban Greening	
Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer , 483	Reiterates comments made during the Regulation 18 consultation. Feels that part E should be amended as there is no evidence to justify the 70% requirement which limits space for rooftop amenity, plant/services and is too restrictive.
Policy 39. Biodiversity and Geodiversity	

Jon Rowles , 484	Highlights that Richmond has set a Biodiversity Net Gain of 20% whilst neighbouring Kingston Upon Thames has set their target at 30%. Feels the Council needs to review why two similar authorities have come have different targets.
Natasha Styles (The Planning Bureau Limited), McCarthy & Stone Retirement Lifestyles Ltd , 485	Feels the Council should not require a BNG of greater than 10%. References that the NPPF requires 10%. Recognises that the 10% is a minimum it should be for the developer to decide whether to go beyond this figure not the Council. It is important to remember that that it is impossible to know what the cost of delivering net gain is until the base level of biodiversity on a site is known and consequently what is required to achieve a 10% net gain. On some sites this may be achievable on site with no reduction in developable area, for others it may require a large proportion of it to be addressed offsite or a significant reduction in the developable area – a far more expensive option that could render a site unviable without a reduction in other policy requirements. Suggests amendments to Policy 39, Point 5.
Summer Wong (RPS), Notting Hill Genesis , 486	Feels Policy 39 is inconsistent with national and regional policy as it requires almost all development in the borough to achieve 20% biodiversity net gain. Think the policy should be amended to be in line with the Environmental Act 2021, to require 10% biodiversity net gain on major development only.
Anna Stott (WSP), Sainsburys Supermarkets Ltd , 487	Highlights that the Richmond Biodiversity Action Plan seeks a net gain of specific habitats, but does not specify 20%. Policy 39 requires 20% BNG. Feels there is no justification as to why double the statutory requirement is sought. Feels Policy 39 should be amended to reflect the requirements of the Environment Act.
Rachel Holmes, Environment Agency , 488	Welcome that their previous comments on the Regulation 18 consultation have been taken onboard with the inclusion of mitigation hierarchy included within the wording of this policy. The requirement for adequate and sufficiently robust information to be submitted alongside planning applications is a welcome addition to this policy. Welcome that comments in their Regulation 18 response in relation to Biodiversity Net Gain (BNG) and have specified the use of the DEFRA metric.
Emma Penson (DWD), Dukes Education Group and Radnor House School , 489	Concerned about the feasibility of achieving 20% biodiversity net gain and whether it places a reasonable and necessary obligation on developers. Consider the 20% to be unjustified and should be removed from the Plan. Also feel the policies need to acknowledge that there will be site specific circumstances where this is not achievable, to ensure that appropriate and sustainable development is not constrained from coming forward. References the example of Kneller Hall.
Lucy Cole , 490	Support for paragraph 21.65 and the reference to nest boxes and bricks.
Mike Priaulx, Swifts Local Network: Swifts & Planning Group , 491	Support for paragraph 21.65 and the reference to nest boxes and bricks.
David Wilson, Thames Water , 492	Recommends that Hampton Water Treatment Works (WTW) SINC is upgraded to a Site of Metropolitan Importance and amalgamated with Stain Hill and Sunnyside Reservoirs to create 'Hampton Water Treatment Works and Reservoirs' Site of Metropolitan Importance. Hampton WTW is a key operational site which should not be unduly constrained by additional planning designations. It is considered that the proposal to upgrade the WTW to a site of metropolitan nature interest is flawed based on the presence of all of the WTW infrastructure development on the site similar to industrial processes and that the proposed upgrade is not evidenced from site surveys. The reservoirs identified are part of the water treatment process and are not suitable for the creation and enhancement of new habitats, as it is important that they are able function fully in line with operational requirements. Furthermore, the full developed Hampton WTW site is also proposed to be included, which is anomalous as it is a developed site with buildings, roads and hardstanding, and no natural/green space. The assessment of the site sets out 'potential' to improve biodiversity conditions. These suggestions of reduced mowing is considered to be fundamentally incompatible with the operation, as there are clear justifications for mowing the grass in operational areas, as it is important for the inspection and identification of any risks or structural issues.

	Think the Council should remove Metropolitan Grade wildlife designations from Hampton WTW.
Policy 40. Rivers and River Corridors	
Gary Backler, Friends of the River Crane Environment (FORCE) , 493	Note that paras 21.91-92 are set out under the subheading "Thames Policy Area". Would like the requirements of para 21.92 which refer explicitly to the Thames to refer equally explicitly to the River Crane; and to include a clear statement protecting all river corridors, including the Crane, as dark corridors, protected from light and noise. An explicit "Dark Corridor" Policy or SPD would give greater reassurance of protection, and might help to resolve tensions with the hierarchy of criteria for floodlighting in Policy 43. Use of the term "dark corridor" in para 21.118 would be helpful in this regard.
Kay Collins (Solve Planning), Port Hampton Estates Limited , 494	Are generally supportive of the provisions of this policy but we consider that it needs to address the situation where site specific conditions which may preclude meeting all or some of these objectives. Alternatively, this could be addressed in the site specific text and final policy for Platt's Eyot.
Rachel Holmes, Environment Agency , 495	<p>Welcome that Part A of Policy 40 – Rivers and River Corridors has been updated to reflect how flood risk works can also benefit the biodiversity of the river corridor.</p> <p>Pleased to see that this includes culverted watercourses, however, this is an important policy, and we would strongly recommend that this is moved into the Rivers and River Corridors policy box (not just in the supporting text). We note that it is in the main policy box of the Flood Risk and Sustainable Drainage Policy but not the Rivers one. We are pleased to see that this buffer policy also includes culverted watercourses.</p> <p>Strongly recommend that in conjunction with this buffer zone policy, the council requires a Landscape and Ecological Management Plan detailing how this buffer will be protected and enhanced in the long-term. This is in line with our previous Regulation 18 comments.</p> <p>Welcomes the specification of the interrelated nature of Policy 8 and Policy 40.</p> <p>Are pleased to see that Part A of this policy has been expanded to include better access to rivers, the creation of new habitats, and improvements to flood defences and storage. As per our comments to the Regulation 18 consultation, this policy should acknowledge the need to bring all waterbodies in the borough into good ecological status/potential in line with WFD requirements.</p> <p>Welcome the inclusion of River Thames specific policy wording, other waterbodies should be referenced and included within the policy. The WFD is an important aspect that should be mentioned within the policy as it's a key piece of legislation that we will assess developments against. This policy should be specific about the nature of the development adjacent to rivers with stronger wording to support this in order to ensure that development meets the objectives of the WFD. Suggest appropriate wording.</p> <p>The DEFRA Biodiversity Net Gain Metric will assess land within 10m of the river as part of the river habitat. Including the requirement for a 10m buffer will aid developers in achieving a minimum 10% biodiversity net gain.</p> <p>Public access (D) should not impinge upon or preclude the future greening of a buffer zone between new development and the river wall. Ideally walkways and footpaths should respect this buffer zone and be set back from the top of bank to allow for a naturalised buffer between the river and the engineered environment. Our starting point for new development on tidal rivers is a 16m buffer.</p> <p>Pleased to see that in paragraph 21.96 they state they will support initiatives to de-culvert rivers where it is feasible and practicable to do so. We would also strongly recommend that they add that they are opposed to culverting watercourses as well because of the adverse ecological, flood risk, human safety and aesthetic impacts. This was also requested previously.</p> <p>Are also pleased to see that you have taken on board our comments in relation to fish passage in paragraph 21.90.</p>
Policy 41. Moorings and Floating Structures	

Suzanne Parkes, Elmbridge Borough Council , 496	Reference their previous comments during the Regulation 18 consultation. Notes that a Gypsy and Traveller Research report was updated in 2022 and that riverboat dwellers were considered as part of this. The conclusion being that there is no evidence to suggest that there is any need to introduce new provision for riverboard dwellers in the borough. It is also noted that no requests for moorings from the community and no reports of unauthorised moorings of riverboats have been made. It also noted that the ongoing London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA) by RRR may help improve the understanding of mooring provision and identify additional need. EBC requests that it is kept informed of the progress of the London-wide GTANA.
Rachel Holmes, Environment Agency , 497	Reference previous comments made during the Regulation 18 consultation and are satisfied by the Council's reasoning for not progressing the recommendation. Any new moorings or floating structures that could bottom out on a falling tide and preclude intertidal mudflat habitat should as a requirement incorporate a timber or metal grid structure to ensure mudflat is preserved and future maintenance to reinstate the bed is not required.
Policy 42. Trees, Woodland and Landscape	
John Sadler, CPRE London , 498	Believe there is scope for actively increasing Richmond's woodland cover by pushing out the boundaries of existing woodland, planting on buffer land, and linking up green sites with strips of woodland and hedgerows. There is also a need for thinking how woodland planting on part of some sites could complement existing land uses – for example by providing a buffer between traffic and amenity area or increasing the diversity and interest of green spaces. Similarly woodland planting between developed land or agricultural land can play a role in reducing flood risk and improving water quality. There is scope for connecting up sites better, and planting hedgerows for buffers to traffic. Many parks could have avenue of trees planted along the paths.
Martha Bailey, London Historic Parks and Gardens Trust , 499	Suggest the addition of two points at Policy 42 Part B: 9) Assess proposed planting schemes against potential impacts on the character of historic landscapes and open spaces. 10) Encourage planting in areas of hardstanding. Also add that it should be borne in mind that where trees are planted within existing parks and landscapes they may disrupt historic planting schemes and create a sense of enclosure by breaking up previously open spaces. The environmental and social impacts of tree planting are maximised when areas of hardstanding are selected.
Policy 43. Floodlighting and Other External Artificial Lighting	
Jo Edwards, Sport England , 500	Supports this policy that considers the positive benefits of sports lighting. Reference to Sport England's Guidance is welcomed.
Rachel Holmes, Environment Agency , 501	Lighting should be informed by guidance set out by the Bat Conservation Trust (hyperlink provided) in additional bird species may also be affected by artificial lighting creating a false dawn and using up vital reserves, especially in the winter. Direct overlighting of the watercourse is not permitted as this affects the diurnal rhythms of fish species.
Improving design, delivering beautiful buildings and high-quality places	
Tim Catchpole, Mortlake with East Sheen Society , 502	Reiterates comments made during the Regulation 18 consultation. Accept that Policy 44 and 45 are separate from Policies 28-33 but thinks they should follow. The Design Process is fundamental to creating a man-made environment, it's not just about facades and footprints, and should surely have higher billing.
Policy 44 Design Process	
Peter Willan and Paul Velluet, Old Deer Park Working Group , 503	Reiterates comments made during the Regulation 18 consultation. Feels Part B needs to be amended.

Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 504	Reiterates comments made during the Regulation 18 consultation. Feels Part B needs to be amended.
Policy 45. Tall and Mid-Rise Building Zones	
Jenny & Rod Linter , 505	<p>Concerned about the height and clustering of buildings across London. Sets out that it is not just a number game and there are many other facets including demographics, migratory movements (and others) to consider.</p> <p>Concerned that the Plan will allow for “mid rise” apartments of 5-6 storeys on the existing Teddington Business Park in Station Road. Confusion that in other council documents 6 storeys is identified as “tall” buildings. Feels that the terms “mid rise” is inappropriate as such height would dominate and overshadow neighbouring properties.</p> <p>Also raises concerns about the clustering or zones of tall buildings, with such development being at odds with the existing built environment. References a number of Listed Buildings, Buildings with Townscape Merit and Conservation Areas) that are within eye-line of the current business park and would be overshadowed by a zone of tall buildings. Also feels as the neighbouring roads are made up of 2 storey Victorian and Edwardian houses, modern tall apartment blocks will look out of place. Feels tall buildings are intrusive and would divide Teddington in two.</p> <p>Highlights that the price of properties in Teddington has risen considerably and have made it impossible for young adults (from the area and further afield) to buy homes in the area. Feels it would be better to focus on providing and maintaining local employment, to retain young working adults and to discourage them from moving out of London. Feels the business park is well designed and that flexible uses could be encouraged on the business park.</p> <p>Seeks assurances around any controls over the type of dwelling that would be allowed, who would the new apartments be aimed at and would they satisfy local needs? Concerned that families are not catered for and often apartments are purchased for investment.</p> <p>Raises concern around demolition of the existing business park buildings and the associated carbon emissions of demolition and redeveloping.</p> <p>Also raises concern about how the area will cope with an increase in population including, the potential demand for water from a significant increase in housing and the capacity of sewers, traffic on the roads during the demolition, construction and then occupation of the development.</p>
Tim Brennan, Historic England , 506	<p>Support for this policy - consider that it is appropriately underpinned by relevant and up to date evidence in the form of the Urban Design Study.</p> <p>Recommends that the policy should refer in bullet point 1 to a need to ‘avoid harm’ to heritage assets rather than to ‘respect the views and vistas’ towards them. This wording is clearer and therefore more effective.</p> <p>Also suggest that areas identified as appropriate for these buildings at appendix 3 continue to contain a degree of ambiguity, both in terms of boundaries and the colour coding within them. Appreciate that a degree of flexibility is helpful in certain situations, in the interests of clarity and as per para 16d of the NPPF, consider that a greater degree of precision is needed in relation to a number of draft site allocations so the potential impacts on heritage assets are properly understood and any harm is avoided.</p>
James Sheppard (CBRE), LGC LTD , 507	<p>Argue that although most of the borough is characterised by areas that have a high degree of sensitivity to change, the LGC site is one of the few areas that can accept change. It is strongly considered that any change through redevelopment in this sub-area, could be progressed in a form that is highly beneficial to the urban design context.</p> <p>Consider that the site is appropriate for designation as suitable for ‘mid-rise’ buildings. Acknowledged that the site’s location and proximity to sensitive landscapes, such as Bushy Park to the South, would preclude the site from being suitable for tall buildings.</p> <p>Strongly advocates that sub-area B2a should be included as a ‘mid-rise building zone’.</p>

	<p>Feels that any future proposed redevelopment of the site for mixed-use, as demonstrated through an illustrative masterplan for the site, as presented to Council officers, could fulfil the criteria as set out in draft Policy 45c. Mid-rise buildings could be carefully located and designed to step down to surrounding existing and proposed buildings and protect the setting of existing buildings including heritage assets; respect the scale, width and proportion of adjacent streets and valued features; and deliver a varied and interesting roofline.</p> <p>Notes that draft Policy 45d, makes an allowance for mid-rise buildings outside of the identified mid-rise building zones where they are within or adjacent to areas which include buildings taller than the prevailing height. However, given the site’s assessed moderate sensitivity to change, we advocate for its inclusion as a mid-rise building zone. Indeed, draft paragraph 22.30 concedes that further suitable sites for mid-rise buildings may become available, particularly those sites which allow for a comprehensive scheme with mid-rise at its centre while still integrating well with the locality, with lower height at the periphery to avoid imposing negatively on the surroundings.</p> <p>Reference the Urban Design study, which states that the LGC site has been assessed as having a relatively ‘low probability of change’. Through continued dialogue with the Council, it has been documented that the LGC site is no longer fit for purpose, is wholly inefficient and ineffective, and must change in the shorter term to ensure business and scientific needs are met into the future. As such, we consider this evidence to be incorrect and misleading. We have previously requested that this probability of change is increased to ‘high (shaded green)’.</p>
<p>Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer, 508</p>	<p>Make the following recommendations to the LBRuT and the Planning Inspectorate:</p> <p>Further consideration should be taken to the emerging context within identified Character Areas, particularly in relation to the emerging masterplan at Kew Retail Park, which is at an early stage of design development and pre-application engagement with LBRuT. It is judged that the identified Probability of Change of Medium does not reflect this, nor the draft site allocation which is now at an advanced stage of adoption.</p> <p>A highly conservative approach has been taken to the identification of the Kew Retail Park as having a Medium sensitivity, which does not reflect the low-quality environment seen across the Site and its negative contribution to the surrounding context.</p> <p>Based on the ‘broad-brush’ approach taken throughout the Urban Design Study, specific height recommendations for Tall Building Zones should be amended to a ranged figure, similar to the approach taken to other Tall Building Zones within the Urban Design Study.</p> <p>Further analysis is still required for Kew Retail Park, including the testing of an 8-storey development scenario. Visibility of such a scenario has been presented within this representation. Further testing is required, including a more varied masterplan, with variations/ articulation in relation to orientation, scale, height and massing. Concerns are also raised with the masterplan tested at Figure 439 (Page 378) of the Urban Design Study.</p> <p>As stated within the Study, a ‘broad brush’ approach has been taken to the assessment, which has been undertaken on a borough-wide scale and is ‘not intended to be exhaustive or detailed’ (Page 321). It is also acknowledged on Page 319 of the Study that every new development will need to consider the specific context of the plot/ Site, and that all development proposals will need to show further detailed analysis at a specific site scale and should have sensitive consideration of the building’s massing, form, style and materials (Page 321). In relation to Kew Retail Park, therefore, the Study should acknowledge its limitations and clarify that tall buildings (above the prescribed 7 storeys, or proposed ranged figures as noted above) could be acceptable with appropriate and contextual detailed design and supported by necessary justification. It is noted here that in relation to the Stag Brewery site, Officers noted within the published Committee Report (22/0900/OUT that ‘Whilst the site is within a tall building zone, the heights exceed the parameters of the Brief and Urban Design Study 2023, and do not meet elements of Policy D9 of the London Plan. Notwithstanding such, on balance, this is acceptable, with additional height mainly centrally located, scaling down to the perimeters, achieving a suitable relationship with the adjacent townscape...’. We consider, therefore, that being overly restrictive in policy terms and within the supporting evidence base could prevent the optimum planning outcomes being achieved.</p> <p>Criteria for assessing the acceptability of a tall building should be undertaken on a site-by-site basis and not solely constrained to within Tall Building Zones.</p>

	<p>Amend restrictive policies relating to specific height parameters, noting the concerns raised with the evidence base underpinning such policies.</p> <p>Amend draft policies so to comply with national planning policy as well as strategic policies set out in the London Plan (2021). In relation to Site Allocation 31: Kew Retail Park, this includes removing overly restrictive references to prescriptive height parameters, especially when such parameters are supported by 'broad-brush' findings and an unsound evidence base (as noted above). We continue to propose amendments to Site Allocation 31 so to require development to be of a high architectural quality, informed by a thorough, site specific assessment, including an assessment of the prevailing townscape character of the area. We also recommend that the text is amended so to require a future applicant to demonstrate how the proposed development corresponds with and to the surrounding character areas, including Kew Residential and Kew Gardens, whilst also requiring the submission of a full and detailed Heritage, Townscape and Visual Impact Assessment, justifying any height proposed across the site.</p>
<p>Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer, 509</p>	<p>Reiterates comments made during the Regulation 18 consultation – Suggested wording changes to make Policy 45 sound.</p>
<p>Martha Bailey, London Historic Parks and Gardens Trust, 510</p>	<p>Feels a bullet point should be added under the 'Visual Impacts' section to identify that tall buildings should have due regard for impact on open spaces: 'Development proposals for taller buildings must demonstrate consideration of the impact on public open space. Impacts may include views in and out of open spaces, the provision of natural light and overshadowing – which can be hugely detrimental to the amenity value and horticultural productivity of green open spaces'.</p>
<p>Katherine Drew, The Royal Parks, 511</p>	<p>Reiterates comments made during the Regulation 18 consultation – Raises that tall buildings around the Parks can have a significant adverse impact on their character, wants to work with the Council to help protect the views from Richmond and Bushy Park.</p>
<p>Smruti Patel (Avison Young), Avanton Richmond Developments LTD, 512</p>	<p>Note that Section A, Part 11 of draft policy 45 requires all buildings over 30 metres in height to be provided with two staircases which is consistent with the Greater London Authority's Statement regarding fire safety and tall buildings and the proposed changes to the Building Regulations. Strongly supports the provision of a second staircase in buildings that meet the identified threshold. However, draft policy 45 does not clarify the method of measurement. The draft policy should be amended to ensure measurement is taken in accordance with the Building Regulations – from ground level to the finished surface of the floor of the top storey of the building (ignoring any storey which is a roof-top machinery or plant area or consists exclusively of machinery or plant rooms).</p>
<p>Henry Brown (The Planning Lab), Royal Botanic Gardens Kew, 513</p>	<p>Kew Gardens WHS is particularly sensitive to the impacts of tall buildings in these locations and therefore RBGK is very keen to see that this policy provides appropriate protection. Concerned that the policy, supporting text and detail set out in Appendix 3 do not consistently specify that the heights set out in Appendix 3 are a 'maximum' – Appendix 3 refers to an 'appropriate height', the policy wording to an 'appropriate height range' and supporting text para. 22.24 to an 'appropriate tall building height range' as well as an 'identified maximum appropriate height'. If it is the intention that the identified heights are a maximum, rather than an expectation for all development in these zones, this needs to be consistently expressed across the relevant parts of the Plan. This approach is required to conform with Policy D9 of the London Plan, which notes that in locations where Boroughs determine tall buildings are an appropriate form of development, they must determine the maximum height that could be acceptable.</p>
<p>Jonathan Blathwayt, GLA on behalf of Mayor of London, 514</p>	<p>Policy 45 definition of Tall Buildings is in line with the minimum height stated in Policy D9 of the LP2021 and as such is welcomed, as is the policy stating that such buildings are only appropriate in the identified Tall Building Zones. The policy also takes account of the protected strategic views and the Kew World Heritage Site which is consistent with Policies HC3 and HC2 in the LP2021 respectively.</p>

	The Tall Building Zones are identified on map 22.1 within the Plan and Appendix 3. These maps highlight both the areas appropriate for Tall Buildings and Mid-Rise Buildings and use a gradient to show the suitability for respective heights. However, this means the maps are unclear as to which areas are appropriate for tall buildings and which are appropriate for Mid-Rise buildings. A clearer spatial definition of Tall Building appropriate zones is recommended.
Rachel Holmes, Environment Agency, 515	Policy should include the expectation that developments will require an overshadowing assessment. Overshading affects diurnal rhythms of fish species and leads to limited growth of vegetated areas and thus could result in inadvertent negation of other policies. Have provided comments on several policy units relating to Water resources and quality, Land Contamination and Waste. Whilst the following recommendations for each policy do not affect the soundness of the plan, they could strengthen each respective policy and the overall the Local Plan.
Neil Henderson (Gerald Eve), Reselton Properties, 516	Reiterates comments made during the Regulation 18 consultation – Feels the policy as drafted is too prescriptive and gives no opportunity for consideration of detailed design being able to influence the extent to which a location is capable of being able to accommodate a tall building.
Summer Wong (RPS), Notting Hill Genesis, 517	Welcome the designation of the middle part of St Clare Business Park (Hampton Hill) as part of the ‘Mid-Rise Building Zone’ in Appendix 3 and on the Policy Map.
Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green), 518	Reiterates comments made during the Regulation 18 consultation - The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas.
Peter Willan and Paul Velluet, Old Deer Park Working Group, 519	Reiterates comments made during the regulation 18 consultation - Concerned at the support given for high rise development at the Richmond Station and elsewhere given the potential for interrupting views and vistas that are so important to the Old Deer Park.
Policy 46. Amenity and Living Conditions – No comments received.	
Reducing the need to travel and improving the choices for more sustainable travel	
Katherine Drew, The Royal Parks, 520	Reiterates comments made during the Regulation 18 consultation – Concerned about the impact of traffic and associated air pollution on designated sites and priority habitats and impacts to be mitigated.
Jonathan Blathwayt, GLA on behalf of Mayor of London, 521	Highlights that the Mayor has recently adopted the Sustainable Transport, Walking and Cycling London Plan Guidance. Richmond should apply the guidance to ensure that walking and cycling are supported and the Mayor’s Healthy Streets approach is implemented and to support the Mayor’s strategic target for 80% of all trips in London to be made by foot, cycle or public transport by 2041.
Duncan McKane, London Borough of Hounslow, 522	Note that LBRuT are intending to draw together existing transport and highways information that has assisted LBRUT to understand the likely traffic impact of the Local Plan into a Background Paper. Because this information is not available to review at the time of the Regulation 19 consultation, LBH Transport officers have not been able to assess the potential cumulative impacts of LBRuT’s proposed housing growth on both the road network and public transport demand locally. It is noted that there are a number of large site allocations located close to the shared boundary which are proposed for residential, amongst other uses (see list above). Given the proximity of these sites to key roads and junctions which cross the shared boundary (specifically the A316 Great Chertsey Road / A312 Hampton Road West/Uxbridge Road, B361 Whitton Road / Whitton Dene and South Circular A205) and the lack of information relating to minimum development quanta for residential units and other non-residential floorspace within the allocations themselves, LBH are not able to determine whether LBRuT’s current proposals would be acceptable in terms of transport and highways impacts.

	Thus, LBH raise a holding objection until they have been able to review the evidence.
Policy 47 Sustainable Travel Choices (Strategic Policy)	
Sammantha Rose, National Highways , 523	National Highways has yet had sight of any traffic modelling affecting the SRN, should it affect the SRN, or had any input to the IDP. Are not aware of any SRN impacts that have been identified. Would appreciate clarification and confirmation.
Richard Carr, Transport for London (TfL) , 524	Reiterate comments made during the Regulation 18 consultation - the need for public transport capacity constraints to be mitigated for developments in higher PTALs, and request for a reference to an Active Travel Zone Assessment either in part C or accompanying text.
Craig Hatton, Network Rail (Southern) , 525	Network Rail agree with the need to provide for inclusive mobility as a result of new development and also believe that such an approach could and should be broadened out to include access to rail stations where these new developments are in close proximity. By not linking development with access to rail stations, as a key part of the public transport network, the Plan fails to accord with its strategy within Policy 1. Network Rail agree that appropriate land for transport should be safeguarded as part of development proposals. This will need to be based on existing and future operational requirements and does not preclude the provision of this infrastructure alongside other forms of development, should this be appropriate and not impact upon operational requirements.
Jon Rowles, 526	Concern that the Opportunity Areas in Hounslow and Kingston Upon Thames will result in more traffic in Richmond. Feel that Richmond's Transport LIP has failed to take into account the need to accommodate the growth in cyclists and traffic as other boroughs have.
Nikki Nicholson, Surrey County Council , 527	Where there are likely to be cross boundary impacts of development proposals in the Richmond Local Plan on Surrey's transport network, consider that these impacts would need to be assessed and appropriate measures identified to resolve them. Would also add that where development in Richmond impacts Surrey's infrastructure and requires mitigation measures, this must be implemented and funded by developers.
Suzanne Parkes, Elmbridge Borough Council , 528	Supports this policy, notes the synergies between the approach EBC have taken in their draft Local Plan (June 2022). EBC has concerns that a Transport Assessment has not been completed in support of the LBRT Publication Local Plan (Regulation 19) document which identifies whether there is any potential cross boundary or cumulative impacts on the road network outside of your borough. It is understood however, that a Topic Paper to address these concerns will be published and shared prior to the submission of your Local Plan. EBC welcomes further engagement on these issues.
Tim Catchpole, Mortlake with East Sheen Society , 529	Note the reference to the TfL modelling. Our concern is that it seems to be shrouded in secrecy. The roads through our area appear to be carrying much extraneous traffic on orbital journeys because the same orbital movement of public transport is clearly inadequate. When did TfL last undertake an O&D survey on the South Circular Road in our area? And does their model take note of this? Note the comment about possible highway safety issues around Mortlake Station and the need for a financial contribution from developers towards improvements. The proposed improvements are cosmetic. We have just recently heard Network Rail's announcement about installing lifts at Barnes Station despite there being no major developments in that area, but they have no such plans for either Mortlake Station (next to the Sheen Lane level crossing) nor North Sheen Station (next to the Manor Road level crossing) where developments are proposed respectively on the Brewery and Homebase sites. Why is this? Note your response to our comment about motorists making long journeys to get fuel and we are pleased to see that you have inserted a new paragraph to cover this point.
Councillor Niki Crookdake , Green Party Councillor for	Concern that extensive development in parts of the Borough will create a significant additional burden on the transport infrastructure in Richmond and the neighbouring boroughs of Wandsworth and Hounslow in particular.

<p>Mortlake & Barnes Common, 530</p>	<p>Concern that the evidence for Richmond’s Transport strategy is taken from Local Implementation Plan 3, which is based on evidence gathered in 2018, more than five years ago, before the closure of Hammersmith Bridge and Sheen Gate, Richmond Park and the change in travel patterns post the pandemic. The recent Urban Design study (2023) recommended the transport and social infrastructure in the East of the Borough needed to be reviewed, however this was not carried out.</p> <p>In July ‘23, over 1,400 residents signed a petition asking for a review to take place, given the concerns over transport and the lack of evidence that the impact of the cumulative effect of the developments on the transport infrastructure had been considered, with or without neighbouring boroughs. A request for a review was also served as a petition on 6 July at the GLA, asking them to work with Richmond Council to consider this, as a matter of urgency, as three of the development sites had been granted planning permission in Richmond.</p> <p>The area is not designated as an Opportunity or Growth Area by the Mayor and is therefore not included at London Level for transport infrastructure improvements. Furthermore, this area will not benefit from Crossrail 2, the Elizabeth line, the Bakerloo line extension or the west London orbital. Developers own transport assessments, have not considered the cumulative impact of the developments as required by London Policy D2 and T4, but have instead concluded that their individual schemes have little impact on the transport network and therefore require little/no mitigation by way of improvements to the transport infrastructure.</p> <p>Feels that in line with NPPF Policy 33, Transport evidence in the LIP should be updated, so that the transport strategy is based on accurate and realistic cumulative transport forecasts from all proposed developments and advice from experts on the optimum way to mitigate these pressures. This has not been done adequately during the planning or local plan process to date in breach of the policies set out below.</p> <p>In line with the NPPF 22, and London Policy D2, the Local plan should be updated to explicitly state that in future, the cumulative impact of all site allocations anticipated in the plan, which have either received planning, are being assessed or have had discussions with the planning officers should be taken into consideration as completed developments when the cumulative impact on the area is being assessed over the next 15 years, in line with the requirement for forward strategic planning, and where the development is large enough, 30 years.</p> <p>Concerned that the infrastructure changes have not been properly considered because the size of the unprecedented development in the East of the Borough is set out incorrectly in the Local Plan (see Housing comments). However, when this was highlighted through the proper channels to officers and members over the last 15 months, rather than engaging on this and trying to resolve the issues, requests have been ignored and detailed written comments on the plan have all been rebutted, in breach of the local plan policy’s commitment to work in partnership with communities.</p> <p>Provides a table of relevant policies and other evidence.</p> <p>Suggests wording amendments to improve the policy.</p>
<p>Jo Edwards, Sport England, 531</p>	<p>Supports this policy.</p>
<p>Luke Burroughs, Transport Trading Limited Properties Limited (TTLP), 532</p>	<p>Refers to part H of this policy - agree that appropriate land for transport should be safeguarded as part of development proposals. This will need to be based on existing and future operational requirements and does not preclude the provision of this infrastructure alongside other forms of development.</p>
<p>Richard Carr, Transport for London (TfL), 533</p>	<p>Welcomes the inclusion of commitments to promote sustainable travel, decrease car use and improve air quality within Policy 47 itself.</p>
<p>Richard Carr, Transport for London (TfL), 534</p>	<p>Welcomes the addition of the final sentence confirming that ‘Planning applicants proposing major developments will need to demonstrate how their proposals help meet these targets.</p>

Richard Carr, Transport for London (TfL) , 535	Welcomes amended wording which now clarifies that 'Cycle parking should, at least, be provided in accordance with the minimum standards in the London Plan.
Richard Carr, Transport for London (TfL) , 536	Welcomes amended wording which recognises TfL's role and states that 'The loss of existing bus garages will be resisted, to safeguard capacity for efficient and sustainable operation of the network, unless it is demonstrated, and confirmed by Transport for London, that it is operationally no longer needed or enhanced re-provision has been made as part of the redevelopment of the site or elsewhere in a convenient and accessible alternative.
Sammantha Rose, National Highways , 537	Think it should be noted that National Highways cannot be a party to Section 106 contributions. Likewise, it should not be presumed that any necessary SRN infrastructure will be funded through a future Road Investment Strategy (RIS), nor can mitigation requirements affecting the SRN be included within the Community Infrastructure Levy at a planning application stage.
Elena Mikhaylova , 538	Concern that this policy is undemocratic and breaches residents human rights. Concerned that the Council is limiting usage of cars in the Borough. Feel this policy is in breach of the Equality and Disabilities act. Concern that this policy is unfair on those who are not able to or do not want to travel by bicycle.
Policy 48. Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management	
John Sadler, CPRE London , 539	Site allocations should not be specifying minimum levels of car parking as this is in conflict with the London Plan. Support proposals to restrict conversion of front gardens for parking – but believe this should be extended to promote the reinstatement of front gardens. Policies could ensure bus lanes, cycle lanes and safe/even pavements are given priority over enabling front garden parking.
Richard Carr, Transport for London (TfL) , 540	TfL guidance on Parking Design and Management Plans is due to be issued for consultation and so a requirement should be added to the policy or accompanying text to require submission of a Parking Design and Management Plan where parking is provided. Welcome additional wording in F5 which states that 'In certain cases, where a development is forecast significant impact on on-street parking stress in an area, mitigation may be sought in the form of financial contributions towards the cost of reviewing and changing an existing CPZ or implementing a new one. Note that no changes have been made to F8 or part G or I. Welcome reference in Part H to provision of on street cycle parking where short stay cycle parking cannot be accommodated on site. In part L, welcome the addition of a reference to TfL guidance. In part M, welcome amended wording which now refers to Construction Logistics Plans.
Natasha Styles (The Planning Bureau Limited), McCarthy & Stone Retirement Lifestyles Ltd , 541	Consider that a requirement for a car free development for critically needed specialist older persons' housing to be inappropriate and unnecessary given the policy requirement in London Plan policy GG1 for older people to 'be able to move around with ease'. Purpose built older person's housing has residents whose needs are substantially different to users of mainstream housing and therefore should be considered on its own case with respect to car parking. Residents of older persons housing, given their age, tend to be frail and are more likely to have mobility difficulties and in some cases in need of a car to move around with ease. They also tend to have frequent visits from carers who often need to drive and therefore an exemption to this policy of individual car parking standards for older persons housing should be considered. Feels the policy should therefore exempt older persons housing schemes from providing car free developments. Recommends text be added to the end of Policy 48, Point F.
Securing new social and community infrastructure to support a growing population	

Tim Catchpole, Mortlake with East Sheen Society , 542	No comments.
Policy 49. Social and Community Infrastructure (Strategic Policy)	
Tom Clarke, Theatres Trust , 543	Supports this policy and the protection it provides to existing facilities to guard against loss, in line with the NPPF.
Jo Edwards, Sport England , 544	Supports this policy. Appendix 2 marketing requirements should expressly exclude sport and recreation facilities that are to be assessed against the Council's evidence base for sport and the NPPF
Mark Jopling, Udney Park Playing Fields Trust , 545	Welcomes the renewal of the ACV status of Udney Park after the change of ownership in 2022. Proposes the deletion of the word "likely" in paragraph 24.19 of the draft Local Plan, ACV is by law a material consideration in Planning for change of use.
Policy 50. Education and Training (Strategic Policy)	
John Sadler, CPRE London , 546	It should be explicitly stated that such searches to identify sites should not include protected or other green sites or other important green infrastructure. Suggest the borough commissions an independent sequential site search for new primary, secondary and special schools. This could lead to safeguarding of sites in each category.
Councillor Niki Crookdake , Green Party Councillor for Mortlake & Barnes Common, 547	References the NPPF and Part Part A of the S3 London Plan Policy requiring Local Authorities to liaise with neighbouring boroughs when planning education provision. The need for cross-boundary co-operation has been further strengthened by the appointment last year of a new London wide Regional Schools Commissioner and is particularly important in light of falling rolls across the capital. There can be no justification to delete this obligation, as currently drafted. The proposal to include Part A is in line with national policy, and also supports effective cross-boundary working and the duty to co-operate. References the cross-party agreement to enhance this policy so that developers and other council contractors employ and/or train residents. Lists suggestions to further strengthen these provisions; To cover the council itself – as they are a large local employer, who can significantly contribute to upskilling and employing the local workforce. Reducing the development threshold from 50 to 10 units, as many of the Richmond developments will be smaller, infill sites. Not giving developers the opportunity to easily avoid these provisions, by claiming specialist skills are required by allowing this only in 'exceptional' circumstances. Provides a table of relevant policies and other evidence. Suggests wording amendments to improve the policy.
Creating safe, healthy and inclusive communities	
Tim Catchpole, Mortlake with East Sheen Society , 548	No further comments on responses.
Policy 51. Health and Wellbeing (Strategic Policy)	
Solomon Green , 549	Draws attention to the lack of A & E facilities within the borough and the difficulty of accessing facilities due to road closures and designated cycle routes (within both LBRuT and neighbouring boroughs). This also applies to ambulances and other emergency vehicles.
Jo Edwards, Sport England , 550	Supports this policy is consistent with Sport England's own Active Design guidance. Recommends a reference to that guidance that has been recently updated is included within the supporting text.
Policy 52. Allotments and Food Growing Spaces	

John Sadler, CPRE London , 551	Concerned that only 9 of the 24 allotments are statutory and therefore many are temporary. Suggest they are all upgraded. Question whether need is 'fluctuating' (as we understand it, the lists have been open and closed a number of times which might be leading to the appearance of fluctuations) and would recommend that a more permanent waiting list is established and advertised. Plots should not be divided when reallocated – most plots in Richmond were half plots (5 rods) but many are now just 2.5 rods which make them too small to adequately rotate crops.
Policy 53. Local Environmental Impacts	
David Wilson, Thames Water , 552	The Plan should assess impact of any development within the vicinity of sewage works and sewage pumping stations in line with the Agent of Change principle. Where development is being proposed within 800m of a sewage treatment works or 15m of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works/pumping station. The Council state that Thames Water would be a statutory consultee as part of the planning application process for major applications. This should be clarified as Thames Water and the Water companies are not statutory consultees (other than for fracking planning applications).
Peter Thompson, National Physical Laboratory (NPL) , 553	NPL undertakes research and programmes of work into air quality as well as greenhouse gas emissions measurement. Policy 53 with a focus on air quality is an area of work that NPL could input into.
Rachel Holmes, Environment Agency , 554	Land contamination - Welcome the inclusion of text to emphasise the risk of new development to water quality and request appropriate mitigation where required. Groundwater is constantly moving and once contaminated it can take a very long time to recover if at all. Therefore, the overarching approach to groundwater protection needs to be considered at the strategic planning stage. In their Reg 18 response they recommended stronger and more clearer wording to clarify what is required both in terms of assessment and suitability when it comes to any proposed development. Acknowledge that there are requirements in the supporting text regarding details of required assessment and mitigation and welcome this as it mirrors what is required within the National Planning Policy Framework. Waste - Requested amended to include additional detail on developer's requirements and for any waste sites specifically to be mentioned. In response it was not considered necessary to specifically mention waste sites, with regards to applicant's requirements for new developments near these sites, as this is covered within 'nuisance-generating uses' and would be subject to the agent of change principle. Agree that Part C of Policy 53 somewhat address this issue, we would still recommend further detail on specific development requirements. This would ensure consistency with each application and establish a baseline for what each developer is required to consider so they can ensure that it is considered as earliest as possible in their design process to maximise opportunities to minimise environmental impacts.
Policy 54. Basements and Subterranean Developments – No comments received.	
Policy 55. Delivery and Monitoring	
Andrew Hunt, HUDU in consultation with South West London Integrated Care Board , 555	Recognises that Richmond Council has incorporated many of the changes that HUDU recommended at the Reg 18 stage of their Local Plan Review, which we welcome. Welcomes the reference made by the Council to social infrastructure in the supporting text of draft Policy 55: 'Delivery and Monitoring', however, reiterates their previous suggestion that a direct reference to health or social infrastructure should be included into the policy criterion itself. This will strengthen the policy as a whole and provide further clarity to developers. Also notes that, following discussion with the ICB, they are intending to comment separately on Richmond's Infrastructure Delivery Plan and future Infrastructure Delivery Schedule in due course.

Jon Rowles, 556	Concern that there is no real monitoring of the policies in the plan and we are seeing a move away from plan-led development in the LBRuT. Suggests an annual discussion of monitoring at the Environment Committee.
Mark Jopling, Udney Park Playing Fields Trust , 557	Concern that Policy 55 on Enforcement and Maintenance is limited to "unauthorised development", this should be extended to include a commitment to Enforcement of material breaches of planning protections and historic s106 commitments, failure to conserve heritage assets and failure to take reasonable attempts to prevent anti-social behaviour.
Katherine Drew, The Royal Parks , 558	Reiterates comments made during the Regulation 18 consultation – Stresses that some of the value of development in the Borough could help to support the maintenance, management and protection of Parks.
Louise Fluker, The Richmond Society , 559	There is a disconnect in that it is not clear how this will apply to existing housing stock and existing buildings and there is no reference to retrofitting at paragraph 26.5.
Peter Thompson, National Physical Laboratory (NPL) , 560	NPL can also provide expertise and guidance to the council to ensure the borough meets the target of net zero carbon by 2043.
Sammantha Rose, National Highways , 561	Would like to better understand the current position of the Local Plan in terms of anticipated future traffic growth (associated with applications) impacting on the SRN, and any mitigation measures (with the IDP) identified to off-set these impacts. It does not appear that National Highways have been listed as one of the key stakeholders on the development of the IDP. However, they would appreciate the opportunity to stay informed and review the progress of the IDP so as to ensure that any SRN impacts would be considered, and if necessary, mitigated.
Julie Scurr, 562	Concerned by how your proposals fit in with the actual planning process, and how much control you actually have to deliver these plans. Highlights local redevelopment projects.
Jon Rowles, 563	Feels the Richmond Local Infrastructure Delivery Plan looks like a draft document in places with a large number of estimated costs missing. Concerned that this could result in schemes going through planning without collecting contributions to infrastructure necessary to support them.
Appendix 1 Maps of Proposed Town Centre Boundaries and Primary Shopping Areas, and Local Centre Boundaries – no comments received	
Appendix 2 Marketing Requirements	
Philip Villars, PMV Planning Limited on behalf of owner of Arlington Works , 564	The two-year marketing period for loss of industrial land is not a reasonable timeframe and is inconsistent with the London Plan Policy E7 paragraph 7.7.5. 12 month is considered a sufficient time period.
Tim Humphries (Firstplan), William Grant & Sons Ltd , 565	A blanket approach is not justified or in conformity with the London Plan; paragraph 28.10 should reference justification supported by evidence of demand and supply, and paragraph 28.12 should be deleted.
Appendix 3 Tall and Mid-Rise Building Zones	
Heather Ayres, 566	The St Clare mid-rise zone is inconsistent with the Hampton Hill strategy. It is unjustified as it goes against local residents who oppose the height of 5 storeys.
Appendix 4: Review of Sites of Importance for Nature Conservation	
Prabhat Kumar, 567	Concerns about upgrading Ham Common West to a site of boroughwide nature conservation importance, and concerns of the implications of designation for existing informal sport and recreation uses.

Emma Penson (DWD), Dukes Education Group and Radnor House School, 568	Dukes Education Group and Radnor House School comment on conflict with the sporting use at Kneller Hall as well as raising the different ownership boundary.
Katherine Drew, The Royal Parks, 569	Reiterates comments made during the Regulation 18 consultation –comments on the designations at Richmond Park and Associated Areas, Bushy Park and Home Park, and Longford River in Richmond.