

Local Plan Review scoping consultation responses and officers' comments

Planning

30 June 2016

Summaries of all responses received to the Local Plan Review scoping consultation, including officers' comments, published by LBRuT in June 2016



Further details, including a record of all responses as received, can be found on the [Council's website](http://www.richmond.gov.uk/councils_website) at: www.richmond.gov.uk/local_plan_review

1. List of all respondents to the public consultation

Please note, the responses outlined in this document are not alphabetically ordered or in any other order of priority.

Respondent reference no.	Name / Organisation
1.	Caroline Britton
2.	S.J Green
3.	Raakhee Patel, Sport England
4.	Alice Jean Cousens
5.	Lucy Owen, Port of London Authority
6.	Caroline Brock, Kew Society
7.	Georg Hoefler
8.	Ian Walton
9.	Shahina Inayathusein, London Underground Infrastructure Protection
10.	Philip Robin
11.	Juliet Nolan
12.	Ross Anthony, Theatres Trust
13.	Neil Wilton
14.	Peter Britton
15.	Fiona McDaniel
16.	Bryony Lodge
17.	Karen Skipper
18.	Murray Smith, Dunphys Chartered Surveyors obo St. Clair Business Centre
19.	James Lloyd, James Lloyd Associates obo Tyton Properties Limited
20.	Ham & Petersham Association
21.	Andrew Payne, Greater London Authority, Mayor of London

Respondent reference no.	Name / Organisation
22.	Kevin Scott, Kevin Scott Consultancy obo Port Hampton Estates Limited (Platts Eyott)
23.	Jonathan Stobbart, CBRE obo The Laboratory of the Government Chemist
24.	Jan Gare, Ham Library Friends Group
25.	Andy Sutch, Sport Richmond
26.	Bryce Tudball, Royal Borough of Kingston
27.	Andrew Barnard
28.	Margaret Simpson
29.	Richard Geary
30.	Kevin Rice
31.	Laura Morgan
32.	Jane Harrisson
33.	Jane Morrisson
34.	Mary Stephens
35.	Paul Lapham
36.	Andree Frieze
37.	James Sinclair, Teddington Society
38.	Krystyna Kujawska, SCAMPS
39.	Max Millington
40.	Diana Collins
41.	Rebecca Bilfinger, GVA obo Lady Eleanor Holles School
42.	Andrew Dorrian, Transport for London Planning
43.	Alice Shackleton

Respondent reference no.	Name / Organisation
44.	Rebecca Pullinger, Campaign to Protect Rural England (CPRE)
45.	Ron McEwen
46.	Kathleen Massey
47.	Paul Massey
48.	Lizabeth Rohovit
49.	Neill Tughan
50.	RPS Planning and development on behalf of S. Oxley
51.	Tim Catchpole, Mortlake with East Sheen Society
52.	Dale Nolan
53.	Tor Barrett, Nathaniel Lichfield & Partners obo West London Mental Health NHS Trust
54.	Cllr Martin Elengorn obo Liberal Dem Group of Councillors
55.	Peter Dowling, Indigo Planning Limited obo Sainsbury's Supermarkets Ltd
56.	Cllr Liz Jaeger
57.	Katherine Jones, Savills obo Thames Water
58.	Katie Brown, Nathaniel Lichfield & Partners obo St Mary's University
59.	Caroline Wilberforce, Indigo Planning Limited obo Ashill Land Limited
60.	Tanja El Sanadidy, Indigo Planning obo Shepherd Enterprises Limited
61.	Louise Spalding, Defence Infrastructure Organisation
62.	Marie-Claire Marsh, Nathaniel Lichfield & Partners obo Rugby Football Union
63.	Daniel Osbourne, Barton Wilmore obo Quantum Group

Respondent reference no.	Name / Organisation
64.	Tor Barrett, Nathaniel Lichfield & Partners obo The Harrodian School
65.	James Sheppard, CBRE obo CBRE Global Investors ('CBREGI')
66.	Joanna Debs, Harlequin Football Club Ltd
67.	Alex Arrol, Goldcrest Land
68.	Robert Mackenzie, RPS obo Richmond-Upon-Thames College
69.	Steve Simms, SSA obo Kentucky Fried Chicken (Great Britain) Limited
70.	Andree Gregory, Highways England
71.	Pauline Holmes, Natural England (Thames Valley Team)
72.	Samantha Davenport , Natural England (Dorset Hampshire Isle of Wight)
73.	Lucy Gate, Public Health, London Borough of Richmond upon Thames
74.	Greg Pitt, Barton Wilmore obo UK Pacific Hampton Station LLP
75.	NHS England , NHS Property Services, Healthy Urban Development Unit (HUDU) and Richmond CCG
76.	James Togher, Environment Agency
77.	Ann Holdsworth, Amec Foster Wheeler obo National Grid
78.	Katharine Fletcher, Historic England
79.	David Shaw, The Alberts Community Association
80.	Laura Stritch, Transport for London Property

Table 1: All respondents to the consultation

2. Summary of main issues raised during the public consultation

2.1 Sustainable Development, Climate Change, Pollution and Waste

- need for local definition for 'sustainable development'
- support for retention of carbon emission reduction targets and continuation of zero carbon initiative
- concerns in relation to air pollution and location of sensitive uses, particularly in areas with poor air quality
- support for introduction of a local policy that deals with local environmental impacts, including air quality, environmental pollution, noise and light pollution, land contamination etc.
- support for green roofs and green walls
- need for local policy on drainage and water/sewerage infrastructure requirements
- support for flood risk management measures as part of Local Plan
- incorporate latest guidance on climate change allowances for flood risk
- inclusion of Thames Estuary 2100 Plan in Local Plan
- support for protecting and enhancing the borough's rivers and water quality

2.2 Historic environment

- support for proposed approach in relation to heritage assets
- due to uniqueness of World Heritage Site and archaeology matters, the retention of specific policies is supported
- need to take account of known and potential threats to Kew World Heritage Site
- some concerns that streamlining policies could weaken them
- specific comments in relation to archaeological priority areas

2.3 Design and character

- strong support for Village Plans to be used for identifying character areas
- incorporate Sport England's 'Active Design' and easy access to a choice of opportunities for sport and recreation
- no weakening of backland development policy
- support for retention of 'unneighbourly' policy
- support for retention of existing policy approach on tall/taller buildings
- need for clearer guidance on areas appropriate for, sensitive to, and inappropriate for tall buildings within the borough
- need to review taller buildings policy, particularly as Whitton would not be suitable for 'taller' buildings
- extend scope of high quality design to conservation areas in line with the conservation area statements
- preference for so-called 'traditional' style should not amount to an attempt to impose particular architectural styles or tastes

- innovative new design should be encouraged
- need to address the connections between people and places and the integration of the natural, built and historic environment
- introduction of basement policy is supported

2.4 Town centres

- need to support and protect community and cultural facilities
- need to consider if and how borough's Town Centres can accommodate additional housing
- need to recognise local distinctiveness in town centre policies
- support for consideration of over-concentration of some uses such as takeaways, betting shops and estate agents

2.5 Natural Environment, Open Spaces, Rivers and Sport & Recreation

- need to refer to Green Belt (London and Home Counties Act) in relation to Fulwell Golf Club
- Playing Pitch Strategy outputs should be reflected in Local Plan
- support for green infrastructure policy
- need to define green infrastructure and ensure it does not only related to sites of strategic importance
- support for the protection and enhancement of the sports grounds and other open spaces across the borough
- refer to NPPF and Sport England's policy on assessing special circumstance in relation to loss of playing fields, taking into account local special circumstances
- strengthen biodiversity policies, with greater emphasis on green corridors/chains
- support for consolidating and streamlining policies relating to rivers
- care needs to be taken with policies increasing/improving access to the riverside/rivers whilst protecting biodiversity and maintaining navigational safety
- updates are required to accurately reflect the status and progress on the development sites included in the Crane Valley SPG
- concerns regarding lighting of sport facilities and absence of lit outdoor facilities
- intention for not reviewing MOL and Green Belt is supported
- there should be a specific review of land designated as MOL
- MOL policy is to protectionist and should be more pro-development in relation to education facilities
- MOL policy should include exception clause for educational uses
- amend MOL boundary on Lady Eleanor Holles School site
- support for MOL boundary change on Harrodian School
- general pressures, e.g. need for school expansion, do not constitute 'very special circumstance' to justify development on MOL/Green Belt
- need to recognise importance of open space for play and recreation

2.6 Transport

- general support for the approach to the revision of the transport policies in Local Plan
- encourage river transport for passengers, tourism and freight
- support for protection of wharves
- protect lock up garages
- need to ensure adequate parking to minimise impact on street congestion and amenity
- consider traffic calming measures
- increased priority for pedestrians and cyclists, also in relation to tackling air pollution
- investigate opportunities for developing homes along transport corridors or around transport nodes, e.g. Crossrail 2 corridor, A316 etc.
- support for high trip generating uses to be located in the most accessible locations
- parking standards – need to take account of latest London Plan standards to strike an appropriate balance; need to be based on accessibility and dependence on the car
- support for car free schemes

2.7 Housing

- affordable housing provision should be a top priority
- support for giving communities access to financial viability data
- rising prices for purchase or private rental are a concern, particularly for key workers
- need for infill or back land development policy as residential land values encourage redevelopment of every piece of land
- need to reflect minimum housing target and that this should be exceeded
- support for borough-wide SHMA to inform the housing target
- need to identify and set policies to address the need for specialist older person's accommodation
- severe shortage of social housing and affordable housing, and an excess of luxury housing in the borough
- need to quantify loss of less expensive housing through allowing larger houses to revert to single family use

2.8 Social Infrastructure, Education, Health and Wellbeing

- policies need to recognise the role of planning to improve health, prevent ill-health and reduce health inequalities
- promotion of cultural facilities and guard against unnecessary loss of valued facilities
- support for aligning health with sport and recreation as well as cycling and walking
- recognise that independent schools as well as state-funded schools help to meet local needs
- support for a new policy approach to restrict concentration and location of hot food takeaways
- disagree with proposal to restrict fast food takeaways in proximity to schools
- need for purpose built properties that deliver the provision of integrated primary and community healthcare services

2.9 Employment, businesses and visitor economy

- general support for aims of policies on key office and employment areas, including on protection of locally and strategically important employment and industrial premises or areas.
- there should be more opposition to changing offices to residential use and more protection for small businesses
- 2-year marketing period for loss of employment uses is too long; consider 12 months instead
- review policy seeking higher affordable housing provision on former employment sites

2.10 Comments on proposed sites to be allocated

- bespoke Thames Water comments in relation to water and sewerage infrastructure provision for key development sites
- bespoke Environment Agency comments in relation to flood risk, flood defences and land contamination where applicable
- Platts Eyot: do not restrict housing potential by focusing too closely on live work units; reference to resisting commuter housing is unclear and unhelpful
- Hampton Traffic Unit: preference is for residential uses and not a social infrastructure site
- Strathmore Centre: need to re-provide for Scamps nursery; perfect site for child-care provider for working parents with children at local schools
- Richmond College: site allocation should accurately reflect latest proposal, including new secondary school and residential units as well as playing field to the south of the college
- RFU site: MOL designation should be removed
- St Mary's University: need to recognise potential for growth in university
- Ham Central Area: exclude library; need for health facilities to be considered
- Cassel Hospital: exclude educational use
- St Michael's Convent: strong support for OOLTI designation
- Stag Brewery: questions regarding the inclusion of a secondary school on site as this was not included in the site brief; need for health facilities to be considered
- Barnes Hospital: concerns about increased demand for primary school places
- NPL: no support for proposed protection of key employment land of LGC part of site; should be allocated as mixed use
- St Claire Business Park: no support for proposed protection of key employment; allow for mixed use scheme
- Sandycombe Centre: no support for proposed protection of key employment; allow for residential-led redevelopment
- allocate Kneller Hall site
- need to protect MOL on Kneller Hall
- Turing House school site in Whitton has not been included in the Plan
- allocate Sainsbury's on Manor Road for replacement foodstore with residential above
- objection to Hampton Wick key office area designation
- allocate Heathlands Industrial estate for residential uses

3. Summary of all responses received and officers' comments

The table below sets out a summary of the comments received, including officers' comments, in relation to the topic/policy areas as outlined in the Local Plan Review scoping consultation. Please refer to the [Council's website](http://www.richmond.gov.uk/councils_website) at www.richmond.gov.uk/local_plan_review.htm for a copy of all comments as received (verbatim).

Sustainable Development, Climate Change, Pollution and Waste

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
4.	Alice Jean Cousens	Definition of sustainable development is not supported because NPPF definition has caused confusion and watered down the ecological meaning of 'sustainable'. Most residents believe that this term means development should not have harmful ecological impacts, and green and open spaces are the most important features for living in this borough; therefore, this may legitimately place a higher standard of ecological protection than set in national or London Plan policy.	The definition for 'sustainable development' is set out in the NPPF. The draft Local Plan includes a Spatial Vision, Strategic Objectives and the Spatial Strategy, all of which expand and build upon the NPPF definition of 'sustainable development' in the context of this borough.
4.	Alice Jean Cousens	Reducing the 20% renewable target is not supported, in line with UK commitment to the Paris agreement, no local government policy should be weakened. DM SD 1 – no support for reduction from 40% to 35%.	The draft Local Plan includes a policy that requires applicants to follow the Energy Hierarchy; the use of renewable energy is part of this hierarchy – see draft policy LP 22. The existing requirement for reducing carbon emission reductions will be continued; the target is only recalibrated as the 35% is now based on Building Regulations 2013 – see draft policy LP 22.
4.	Alice Jean Cousens	Decentralised energy: definition is not clear; most residents will not recognise this term; should not allow undermining the concept of renewable energy.	The draft Local Plan includes a more detailed and updated policy on Decentralised Energy – see draft policy LP 22.
4.	Alice Jean Cousens	No support for consolidating climate change policies due to the risk of undermining or watering them down.	The draft Local Plan continues to have a policy on climate change adaptation (LP 20), flood risk and sustainable drainage (LP 21) and sustainable design and construction (LP 22).
5.	Lucy Owen, Port of London Authority	Given the riparian nature of the Borough, the definition of sustainable development / sustainable construction should include maximising the use of the river during construction where practicable in line with policy 5.18B of the London Plan.	The draft Local Plan includes a policy on the borough's river corridors (LP 18). In addition, policy LP 20 on waste management requires development proposals, where appropriate, to make use of the rail and the waterway network for the transportation of construction, demolition and other waste.
21.	Andrew Payne, Greater London	Sustainable development definition: note that Housing Standards Housing Standards review seeks to limit the role of planning in	See draft Local Plan policy LP 22 on Sustainable Design and Construction.

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	Authority, Mayor of London	construction and therefore it may be more appropriate to use the terminology 'sustainable design and construction'.	
21.	Andrew Payne, Greater London Authority, Mayor of London	Support the proposals to recalibrate the carbon dioxide reduction targets set out in London Plan policy 5.2 and adopt the optional higher standard for water efficiency. Borough should set out approach to carbon dioxide 'off-setting'.	Noted. This is referred to in draft Local Plan policy LP 22.
21.	Andrew Payne, Greater London Authority, Mayor of London	Support the inclusion of robust policies on all sources of flooding and sources of pollution.	Noted. See draft Local Plan policy LP 21.
31.	Laura Morgan	The Local Plan should specify that no schools, hospitals, care homes or other similar facility should be built in areas which exceed the Air Quality Objective.	See draft Local Plan policy LP 10 on Local Environmental Impacts, Pollution and Land Contamination; sub-section (B) of this policy sets out criteria in relation to air quality.
32.	Jane Harrisson	Lower Mortlake Road has the worst air quality of all the tested areas in the borough; no more schools, hospitals, old folks homes etc. should be built along this corridor.	See draft Local Plan policy LP 10 on Local Environmental Impacts, Pollution and Land Contamination; sub-section (B) of this policy sets out criteria in relation to air quality.
34.	Mary Stephens	Air pollution is a major factor impacting health of residents, particularly the elderly and the very young. It appears from your information that safe levels have been exceeded. There is a lack of taking strong action to limit pollution in the borough.	See draft Local Plan policy LP 10 on Local Environmental Impacts, Pollution and Land Contamination; sub-section (B) of this policy sets out criteria in relation to air quality.
35.	Paul Lapham	Aware of the need for expansion of local infrastructure for schools and related services. However, environmentally unsuitable sites chosen for these purposes may have negative impacts on the health of our young, old and vulnerable. The Local Plan should specify that no schools, hospitals, care homes or other similar facility should be built in areas which exceed the Air Quality Objective.	See draft Local Plan policy LP 10 on Local Environmental Impacts, Pollution and Land Contamination; sub-section (B) of this policy sets out criteria in relation to air quality.
40.	Diana Collins	In December 2014, the Environmental Audit Select Committee of the House of Commons recommended no hospitals, care homes or educational establishments should be located near pollution "hotspots". In Richmond, there are several locations, in particular the A316 Lower Mortlake Road where the average amount of NO2 regularly exceeds the Air Quality objective.	See draft Local Plan policy LP 10 on Local Environmental Impacts, Pollution and Land Contamination; sub-section (B) of this policy sets out criteria in relation to air quality.
45.	Ron McEwen	Concerns re noise pollution: no building works during the nights, particularly railway stations.	See draft Local Plan policy LP 10 on Local Environmental Impacts, Pollution and Land Contamination; sub-section (C) of this policy sets out criteria in relation to noise. In addition, sub-section (G) requires Construction Management Statements for certain types of developments.
36.	Andree Frieze	Continue with Zero Carbon initiative; failing this, adopt Passivhaus building standards for all new buildings across the borough.	See draft Local Plan policy LP 22 on Sustainable Design and Construction, which sets out requirements for carbon

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		All new buildings (commercial, leisure, residential, retail) should have Photo Voltaic panels fitted as standard; owners of all existing buildings should be encouraged to have them retrofitted (e.g. all schools in the borough, stadium, swimming pools etc.)	emission reductions, including the requirement to follow the energy hierarchy, of which renewable energy is part of. Sub-section (E) of this policy deals specifically with retrofitting in existing properties.
36.	Andree Frieze	Take account of air pollution statistics and the fact that the average amount of NO2 measured in LBRUT regularly exceeded safe levels across 17 sites in the borough, with particular spikes in Red Lion Street and Lower Mortlake Road. To protect the most vulnerable in our borough the revised local plan should specify that no schools, hospitals, care homes and similar facilities should be located at any site that exceeds the Air Quality Objective.	See draft Local Plan policy LP 10 on Local Environmental Impacts, Pollution and Land Contamination; sub-section (B) of this policy sets out criteria in relation to air quality.
43.	Alice Shackleton	Support Andree Frieze's (36) comments. No school, home for the elderly, hospital or other similar institution should be permitted on a site that exceeds the Air Quality Objective, in particular, to sites along the Lower Mortlake Road between Manor Circus and Richmond Circus, which consistently exceed the threshold in the Air Quality Objective.	See draft Local Plan policy LP 10 on Local Environmental Impacts, Pollution and Land Contamination; sub-section (B) of this policy sets out criteria in relation to air quality.
51.	Tim Catchpole, Mortlake with East Sheen Society	Definition of 'sustainable development' – does this include creation or extension of a basement to provide a domestic cinema and/or gymnasium. Support for the policy to include sustainable construction. Would like to see a system of compensation introduced for victimised neighbours.	The definition for 'sustainable development' is set out in the NPPF. The draft Local Plan includes a Spatial Vision, Strategic Objectives and the Spatial Strategy, all of which expand and build upon the NPPF definition of 'sustainable development' in the context of this borough. Note the draft Local Plan policy LP 11 on subterranean developments and basements. Also see draft Local Plan policy LP 22 on Sustainable Design and Construction.
51.	Tim Catchpole, Mortlake with East Sheen Society	Support for the policy to include sustainable construction.	Noted. See draft Local Plan policy LP 22 on Sustainable Design and Construction.
51.	Tim Catchpole, Mortlake with East Sheen Society	Support the introduction of any local policy and guidance that deals with protecting and enhancing the quality of the local environment including air quality, environmental pollution, noise and light pollution, land contamination, etc.	See draft Local Plan policy LP 10 on Local Environmental Impacts, Pollution and Land Contamination.
51.	Tim Catchpole, Mortlake with East Sheen Society	We note that the Council's response to consultations about further development at Heathrow will be informed by the Council's policies relating to matters such as air quality and noise. This is supported.	Comment noted.
54.	Cllr Martin Elengorn obo Liberal Dem Group of Councillors	CP1 - We don't favour restricting this policy to construction matters. This would, inter alia, exclude changes of use and weaken the policy	Noted. See draft Local Plan policy LP 22 on Sustainable Design and Construction.

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54.	Cllr Martin Elengorn obo Liberal Dem Group of Councillors	DM SD 2 – the continued absence of a draft revised Climate Change Strategy is regretted and this policy needs to be consistent with it.	Comment noted.
54.	Cllr Martin Elengorn obo Liberal Dem Group of Councillors	DM SD 5 – We favour greater emphasis on green roofs and walls and greening generally.	Comment noted. See draft Local Plan policy LP 17 on Green Roofs and Walls.
54.	Cllr Martin Elengorn obo Liberal Dem Group of Councillors	Support for more work on air pollution, noise and light pollution	Noted. See draft Local Plan policy LP 10 on Local Environmental Impacts, Pollution and Land Contamination.
57.	Katherine Jones, Savills obo Thames Water	Thames Water supports existing Policy DM SD 9; Policy DM SD 10; and Policy CP16 Local Services / Infrastructure. A key sustainability objective for the preparation of the new Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. This is in line with para 156 and 162 of the NPPF; as well as London Plan policies 5.14 and 5.15. Site-specific comments based on desktop assessments are provided in relation to wastewater infrastructure, but more detailed modelling may be required to refine the requirements. Where we have identified sites where drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development, in the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure required to support the development in line with Policies DM SD 9, DM SD 10 and CP16.	Noted. See draft Local Plan policy LP 23 on Water Resources and Infrastructure. This policy also requires applicants for major development proposals to provide evidence that adequate capacity exists in the public sewerage and water supply network to serve their development in the form of written confirmation.
57.	Katherine Jones, Savills obo Thames Water	Thames Water support Policy DMSD7. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.	Noted. See draft Local Plan policy LP 21 on Flood Risk and Sustainable Drainage.
68.	Robert Mackenzie, RPS obo Richmond-Upon- Thames College	DM SD 2 – The Council's recognition that there is relatively low probability of decentralised energy development in the borough is noted. It is anticipated this approach will remain in any rewording of the policy.	Noted. The draft Local Plan includes a more detailed and updated policy on Decentralised Energy – see draft policy LP 22.
78.	Katharine Fletcher, Historic England	CP1, CP3, DM SD3, SD6 and SD8: support proposed approach to ensure that the local plan clearly addresses sustainable development using the overarching definition in the NPPF. This is a good	Comments noted. The draft Local Plan includes a Spatial Vision, Strategic Objectives and the Spatial Strategy, all of which expand and build upon the NPPF definition of

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		<p>opportunity to set out the breadth of considerations that are encapsulated within the definition, including that the historic environment is identified as a key strand within the environmental dimension (i.e. NPPF para 17(10), which states that planning should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.)</p> <p>Support separate policy on sustainable construction.</p> <p>Refer to '<i>Energy efficiency and Historic Buildings</i>' for HE advice on retrofitting historic buildings and energy conservation.</p> <p>Refer to '<i>Flooding and Historic Buildings</i>' with regard to climate change adaptation.</p>	<p>'sustainable development' in the context of this borough. The HE advice on energy efficiency and historic buildings is already referred to in the Council's Sustainable Construction Checklist SPD. The HE advice on flooding and historic buildings will be included in the next review and update of the Sustainable Construction Checklist SPD.</p>
76.	James Togher, Environment Agency	<p>Town centres such as Richmond and Twickenham are located in high risk flood risk areas. The local plan offers opportunities for regeneration of the town centres and riverside sites to contribute towards managing flood risk through resilient design and retrofitting e.g. raised floor levels, building resilience and educating residents and businesses on preparing and managing flood risk.</p> <p>Richmond is a unique borough which regularly experiences high tides across the riverside areas in Richmond and Twickenham and remains operational and resilient, this could be shared with other councils to demonstrate "making space for water" approach and how residents and visitors are living with high tide events.</p>	<p>Noted. See draft Local Plan policy LP 21 on Flood Risk and Sustainable Drainage.</p>
76.	James Togher, Environment Agency	<p>Improvement of rivers through partnership working, e.g. Crane Valley Partnership, Friends of River Crane (Force), Thames 21 and Beverley Brook Catchment Partnership.</p> <p>References to EA's River Thames Scheme, TE2100 and Drain London, including updating of SFRA are welcomed.</p> <p>National climate change allowances are currently being updated (spring 2016) so the Local Plan policies and SFRA should be reviewed to incorporate the latest evidence as land use planning decisions should be based on the latest and most accurate climate change data and evidence.</p> <p>TE2100 briefing for Richmond has been attached; key issues and opportunities are:</p> <ul style="list-style-type: none"> • Raising existing flood defences to the required TE2100 Plan levels; or demonstrate how tidal flood defences protecting sites can be raised to the required TE2100 levels in the future through submission of plans and cross-sections of the proposed raising; • Demonstrating the provision of improved access to existing flood 	<p>See draft Local Plan policy LP 21 on Flood Risk and Sustainable Drainage, which includes references to the River Thames Scheme and TE2100.</p> <p>Climate change allowances, the specific issues and opportunities from the TE2100 Plan for Richmond as well as other detailed flood risk advice for developments are set out in the Council's recently published Strategic Flood Risk Assessment (May 2016).</p>

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		<p>defences and safeguarding land for future flood defence raising and landscape, amenity and habitat improvements;</p> <ul style="list-style-type: none"> • Maintaining, enhancing or replacing flood defences to provide adequate protection for the lifetime of development; • Where opportunities exist, re-aligning or setting back flood defence walls and improving the river frontage to provide amenity space, habitat, access and environmental enhancements. • Securing financial contributions towards the anticipated costs of flood risk management infrastructure required to protect the proposed development over its lifetime. • The overall cost of the flood defence system for Richmond for the period to 2050 is about £270 million. • Liability for maintenance and ultimate replacement of tidal flood defences is with the Riparian Owner (freeholder of the land under or adjacent to the tidal defence). The council should be aware of these costs because contributions may be needed where the Council is the Riparian owner, a Riparian Owner cannot be found, or the Riparian Owner is unable to finance works. 	
76.	James Togher, Environment Agency	<p>SPD on environmental quality and improvements is supported; this could go further and focus on river corridor improvements, e.g. River Crane.</p> <p>We understand the importance of increasing/improving access whilst at the same time protecting and enhancing the rivers' biodiversity, this could be addressed through the Environmental SPD.</p> <p>Comments have also been submitted in relation to the Water Framework Directive.</p>	<p>See draft Local Plan policy LP 10 on Local Environmental Impacts, Pollution and Land Contamination.</p> <p>There is a separate draft Local Plan policy on River Corridors (LP 18).</p> <p>Draft Local Plan policy LP 23 on Water Resources and Infrastructure deals with water quality aspects, including the Water Framework Directive.</p>
76.	James Togher, Environment Agency	<p>Policies relating to rivers should also refer to the need to protect and improve the tidal flood defences, particularly where tidal defences are set back from the rivers' edge.</p> <p>We support the need to clearly set out the requirements for a public footpath alongside the River Thames and to manage expectations in terms of residential moorings. Often moorings can cause local environmental and social issues and if not carefully designed and located can cause major flood risk issues such as coming loose from moorings and damaging bridges during major flood events.</p> <p>Opportunities for environmental improvements: Beverley Brook within Richmond Park, Palewell Common and Vine Road Recreation ground, where improvements to the river could be made (e.g. realigning or creating a bypass channel)</p>	<p>See draft Local Plan policy LP 21 on Flood Risk and Sustainable Drainage, of which sub-section (D) deals with Flood Defences.</p> <p>The draft Local Plan policy on River Corridors (LP 18) sets out the requirements for a public footpath.</p> <p>There is also a draft policy (LP 19) on Moorings and Floating Structures.</p>

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76.	James Togher, Environment Agency	CP3 – refer to TE2100, River Thames Scheme and TLS; could also refer to encouraging communities to produce their Flood Plans and signing up for flood warnings; together with DM SD 4, could also mention the impact of climate change on biodiversity and how those impacts can be avoided/mitigated, e.g. by maintaining/creating a network of green corridors	See draft Local Plan policy LP 21 on Flood Risk and Sustainable Drainage, which includes updated references. The draft Green Infrastructure policy (LP 12) as well as the draft Biodiversity policy (LP 15) and the Climate Change Adaptation policy (LP 20) reflect the importance of biodiversity, climate change adaptation and corridors for the movement of species.
76.	James Togher, Environment Agency	Local Plan could identify potential areas for "making space for water" and how riverside areas could be adapted for rising tides and reduced use of the Thames Barrier in line with the TE2100 plan actions, e.g. new riverside terracing, riverside parks, setting back of defences possibly around Kew and Barnes, restoring Ham Lands to natural floodplain etc. Riverside improvements could be linked to the CIL Reg 123 List and new Green Infrastructure policy.	See draft Local Plan policy LP 21 on Flood Risk and Sustainable Drainage, of which sub-section (D) deals with Flood Defences. This specifically encourages setting back development from flood defences. Note that the CIL Regulation 123 List is an adopted list and the process of reviewing it is separate to the Local Plan.
76.	James Togher, Environment Agency	We are pleased to see the majority of the proposed site allocations are outside the highest risk flood zones; detailed feedback is provided for sites, particularly those adjacent to rivers. Sequential Test should be undertaken to support Local Plan.	Noted. The comments on the specific sites have been taken into account in the draft site allocations. A flood risk sequential test has been prepared to support the site allocations.

Historic Environment

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
13.	Neil Wilton	CP7 – need to positively reflect the 1920's/30's heritage of much of Whitton's development between the wars. Planning officers should have more regard to heritage elements when assessing design/materials and should not measure against existing contemporary design; need to take account of Village Plan.	Noted. See draft local Plan policy LP 1 on Local Character and Design Quality. In addition, draft policy LP2 on Building Heights also refers to Whitton and its character.
37.	James Sinclair, Teddington Society	The concept of buffer zones, as mentioned in the context of Kew Gardens, should be extended to conservation areas. It is often the case that development can have an adverse impact on a conservation area, without being located within it.	Noted. Kew World Heritage Site has a defined buffer zone in line with the World Heritage Site Management Plan. There is no such buffer zone for Conservation Areas. Draft Local Plan policy LP 3 ensures that Conservation Areas are protected and where possible enhanced.
37.	James Sinclair, Teddington Society	BTM designation is important in maintaining the character of Teddington; concerns that streamlining and consolidating could result in a significant dilution of their status.	See draft Local Plan policy LP 4 on Non-designated Heritage Assets, which confirms that there is no 'dilution' of the status of BTMs.
78.	Katharine Fletcher,	Comments from the Greater London Archaeological Advisory Service	The comments from GLAAS have been incorporated. See

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
	Historic England	<p>(GLAAS), including suggested wording for DM HD 4: Archaeological investigations in Richmond to date have revealed evidence of prehistoric, Roman, Saxon, Medieval and post Medieval archaeology. An archaeological site is a place (or group of physical sites) in which evidence of past activity is preserved and can also include industrial sites, marine and foreshore deposits/structures, buildings, machinery, roads, artefacts, wartime structures and modest domestic buildings.</p> <p>The preservation of archaeological remains is a material consideration when determining planning applications.</p> <p>Prospective developers should make an initial assessment of the archaeological potential and significance of a site by consultation with the appropriate specialist bodies, Historic England and the Greater London Archaeology Archaeological Advisory Service (GLAAS)'. The Greater London Archaeology Advisory Service (GLAAS) are the Borough's archaeological advisers and should be consulted with regard to archaeological matters.</p> <p>Archaeological Priority Areas (APAs) can be identified by Local Planning Authorities under the Town and Country Planning Act 1990 and the Richmond APAs are shown on the Borough's Archaeological Constraints Map. Archaeological work should be in accordance with current guidance from the Chartered Institute of Field Archaeologists and GLAAS guidance.</p>	draft Local Plan policy LP 7 Archaeology.
78.	Katharine Fletcher, Historic England	<p>General support for analysis, issues and proposed approach in relation to the historic environment. All current policies are strong, but require updating to ensure alignment with NPPF and PPG.</p> <p>The borough's exceptional historic environment justifies a number of individual policies for different heritage assets, including separate policies for the Royal Botanic Gardens Kew World Heritage Site, and for archaeology.</p> <p>Need to reflect a positive strategy for the historic environment, which can be delivered in the plan through the heritage policies.</p> <p>A Heritage Topic Paper to support the local plan, bringing together the evidence base and identifying priorities for a positive strategy is recommended.</p> <p>Strong support for Village Plans based on identified character areas, which can support local plan policies in requiring new development to make 'a positive contribution to local character and distinctiveness' (NPPF para 126). We recommend that once the Village Plans are completed that you take the opportunity to add a strategic overview,</p>	<p>Comments are very helpful and appreciated. Suggestions have been incorporated throughout the section on Local Character and Design:</p> <ul style="list-style-type: none"> - there remain stand-alone policies on Kew WHS and archaeology - the introductory text to draft Local Plan policy LP 3 sets out the 'positive strategy' for the historic environment - a Heritage Topic paper will be prepared to support the 'Publication' version of the Plan - Village Plan SPDs are referenced and referred to throughout the Plan and in particular within the section on Local Character and Design - draft Local Plan policy LP 6 on Kew WHS recognises the potential threats from development in Brentford and Hounslow's wider Great West Corridor.

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		<p>to bring to the fore the significance of Richmond's exceptional heritage in a local and London-wide context. This can build on the character areas established through the Village Planning SPDs and need not be a major piece of work.</p> <p>Need to ensure that known and potential threats to the borough's heritage assets are addressed in the plan, including the protection of the setting of Royal Botanic Gardens Kew World Heritage Site and any cross boundary issues raised by recent tall building proposals in Brentford. The outcome could be referred to within the policy for the World Heritage Site to ensure that its setting is understood to be more extensive than the defined buffer zone.</p> <p>Need for a positive conservation strategy to address assets on the Heritage at Risk Register, or heritage assets that could become at risk, e.g. through redundancy from their present use.</p> <p>Clarity will be needed in the local plan policies with regard to the intangible heritage of the borough that brings significance by association; for instance, the landscape and views portrayed in art and literature. A Heritage Topic Paper can assist with this by laying out the different heritage values that need to be considered to sustain the significance of the borough.</p>	

Design and Character

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
3.	Raakhee Patel, Sport England	Support (with amendments); it is recommended that Sport England's Active Design Guidance is referenced. Easy access to a choice of opportunities for sport and physical activity should be part of master planning of major new housing and mixed use development schemes. Active Design, its three key principles of accessibility, amenity and awareness, including its criteria, provide an innovative set of design guidelines to promote opportunities for sport and physical activity in the design and layout of development.	Draft Local Plan policy LP 31 on Public Open Space, Play Space, Sport and Recreation refers to Sport England policies and guidance. Draft Local Plan policy LP 30 on Health and Wellbeing promotes and encourages active and healthy lifestyles.
4.	Alice Jean Cousens	No weakening of 20m for backland development – should be seen as the very minimum and evergreen screening should be required. Retain the word 'unneighbourly' as its sets a principle and an aspiration that residents understand.	Noted. See draft Local Plan policy LP 8 on Amenity and Living Conditions, which continues to ensure there is a minimum distance of 20 metres between main facing windows of habitable rooms. The new draft policy sets out specific guidance and criteria that need to be taken into account to ensure proposals are not harmful to the

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
			amenity and living conditions to occupants of existing, adjoining and neighbouring buildings.
13.	Neil Wilton	Whitton, East Sheen and Teddington are identified as potential for taller buildings in town centre locations. There are no sites in Whitton where 'taller' development would be appropriate and this approach would contradict previous planning decisions. None of the existing buildings are more than 3-storeys (except for a few around the station); possibly mansard roof extensions without impacts on street-scene but not 'taller' buildings. Not supported by Village Plan SPD either.	See draft local Plan LP2 on Building Heights. This takes account of the comments made, including that in Whitton, 'taller' buildings are unlikely to be appropriate due to the predominately 3-storey existing buildings.
37.	James Sinclair, Teddington Society	Whilst the need to strengthen the focus on high quality design is welcome, we would like to see the scope of this extended to specifically refer to conservation areas. The Council should seek high quality design in conservation areas that will respect both their character and, particularly, the characteristics set out in the conservation area statement.	Noted. This has been taken account of in draft Local Plan policy LP 3, which ensures that Conservation Areas are protected and where possible enhanced. In addition, Local Plan policy LP 1 on Local Character and Design Quality seeks high quality design in all parts of the borough.
42.	Andrew Dorrian, Transport for London Planning	TfL released its refreshed Streetscape Guidance in December 2015; this should be referred to in the plan.	This will be referred to in the forthcoming SPD on Sustainable Transport Choices.
51.	Tim Catchpole, Mortlake with East Sheen Society	There needs to be clearer guidance on areas appropriate for, sensitive to, and inappropriate for tall buildings within the Borough. This should also apply to tall structures such as telecom masts (like the 25m high 'monopole' that was proposed in East Sheen last year).	See draft local Plan LP2 on Building Heights, which takes account of the comments made and also highlights specifically East Sheen. The draft Local Plan contains a new policy on Telecommunications (LP33), which will ensure that any visual impacts of telecommunications proposals are minimised and built in accordance with policies on Local Character and Design.
54.	Cllr Martin Elengorn obo Liberal Dem Group of Councillors	DM DC 1 – the NPPF's guidance on design and, in particular, paras 60, 62 and 63 needs to be reflected in policies much more closely. In particular independent local design review arrangements should be reinstated, preference for so-called "traditional" style should not amount to an attempt to impose particular architectural styles or tastes (where appearing in policies the word "traditional" needs to be more precisely defined and justified) and innovative new design should be encourage.	Noted. See draft Local Plan policy LP 1 on Local Character and Design Quality, which focuses on high quality design, as well as Village Planning Guidance and other SPDs relating to character and design.
78.	Katharine Fletcher, Historic England	Developments should respond to local character and history; planning policies should address the connections between people and places and the integration of the natural, built and historic environment. With respect to tall buildings, the present policy identifies limited opportunities in the town centres, and seeks to respect local context	Draft Local Plan policy LP 1 on Local Character and Design Quality focuses on the relationships to other buildings, connections as well as public realm. See draft local Plan LP2 on Building Heights, which takes account of the comments made in relation to ensuring building heights respect the local context and character.

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		by proposing specified additional storey increases above the prevailing building heights. We consider that this is a suitable approach. The proposal to distinguish between 'tall' and 'taller' buildings may appear to offer a nuanced approach; however, we would caution against adding complexity or setting a rule for 'taller' buildings across the borough which may have a variable impact in terms of the local context.	

Town Centres

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
12.	Ross Anthony, Theatres Trust	DM TC 5 should be updated to support and protect community and cultural facilities.	Community and cultural facilities are protected as part of the new draft Local Plan Policy LP 28 on Social and Community Infrastructure.
21.	Andrew Payne, Greater London Authority, Mayor of London	Town centre health checks will be coordinated by the GLA during 2016 and will help inform the Borough's town centres policies. Need to consider, in line with policies 2.15 and 3.3 of the London Plan, if and how borough's Town Centres can accommodate additional housing.	The comments in relation to the Town centre health checks are noted. The Spatial Strategy of the draft Local Plan including draft Policy LP 25 on Development in Centres set out how the borough's centres will accommodate additional housing.
37.	James Sinclair, Teddington Society	In relation to retail frontages, the scope of the policy should be extended to recognise local distinctiveness, for example in Teddington High Street. This should reinforce any powers afforded by conservation area status.	The draft Local Plan Policy LP 25 on Development in Centres sets out the local distinctiveness of the borough's centres.
51.	Tim Catchpole, Mortlake with East Sheen Society	We agree that the Local Plan needs to look at the over-concentration of some uses such as takeaways, betting shops and estate agents in our town centres. In our East Sheen centre we certainly have an over-concentration of estate agents and this needs to be addressed.	Over-concentration of uses is addressed in draft Local Plan Policy LP 26 on Retail Frontages.
73.	Lucy Gate, Public Health, London Borough of Richmond upon Thames	DM TC 1 – consider Healthy Weight Environment TCPA PHE Planning guidance	See draft Local Plan policy LP 30 on Health and Wellbeing, which promotes and encourages active and healthy lifestyles. The TCPA guidance has been used to inform the Local Plan and its Spatial Strategy.

Natural Environment, Parks, Open Spaces, Rivers and Sport & Recreation

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
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Ref. no.	Name / Organisation	Summary of comments	Officers' comments
2.	S.J Green	It should be made clear that – in line with Examiner's report into DMO – Land at Fulwell Golf Club, Twickenham Golf Club, Squires Garden Centre, the allotments at Sixth Cross Road and Natalie Mews is held under the Green Belt (London and Home Counties Act)	See draft Local Plan policy LP 13 on Green Belt and Metropolitan Open Land, which states that 'For the avoidance of doubt, Green Belt includes land identified in the Green Belt (London and Home Counties) Act 1938.'
8.	Ian Walton	All the 213 acres of land including, Fulwell Golf Course, Squires Garden Centre, Natalie Mews Housing, the allotments, Twickenham Golf Course and the Amida Sports Centre, should be shown in the Plan denoting the status of the land as 1938 Green Belt controlled by the 1942 Deed of Covenant. See the Examiner's report of 12 September 2011 into the DMP.	See draft Local Plan policy LP 13 on Green Belt and Metropolitan Open Land, which states that 'For the avoidance of doubt, Green Belt includes land identified in the Green Belt (London and Home Counties) Act 1938.'
3.	Raakhee Patel, Sport England	Support (with amendments); should be revised in line with Sport England policy objective 13 . With regard to the evidence base required by the NPPF, Sport England is aware that a revised Playing Pitch Strategy is in the process of being finalised.	The Council has an adopted Playing Pitch Strategy. Also see draft Local Plan policy LP 31 on Public Open Space, Play Space, Sport and Recreation.
3.	Raakhee Patel, Sport England	Outputs of the Playing Pitch Strategy should be fed into the Council's Regulation 123 List.	The process of reviewing and updating the Council's CIL Regulation 123 List is separate to the Local Plan Review.
4.	Alice Jean Cousens	Support the reference to 'gains in biodiversity'. Need a definition for 'green infrastructure' – does this specifically embrace the concept of biodiversity? Concerned that this will only protect those of 'strategic importance' and does not take account of cumulative significance of green routes, e.g. hedgehog routes.	See draft Local Plan policy LP 12 on Green Infrastructure, which sets out that green infrastructure is a network of multi-functional green spaces and natural elements, which provides multiple benefits for people, nature and the economy. Therefore, it does not only relate to those of strategic importance.
5.	Lucy Owen, Port of London Authority	The principle of consolidating and streamlining policies relating to the River Thames whilst retaining existing policy approaches is welcomed. Care needs to be taken with any policy increasing/improving access to the riverside or to the river itself and protecting and enhancing the rivers' biodiversity whilst maintaining navigational safety. There are also health and safety implications of accessing the river. Will there also be policy approaches relating to leisure and visitor moorings?	See draft Local Plan Policy LP 18 on River Corridors, which deals with access to, and alongside, the rivers. Also see draft Local Plan Policy LP 19 on Moorings and Floating Structures.
6.	Caroline Brock, Kew Society	Support for 'green infrastructure'. Alignment with the Greater London National Park City should be considered.	Noted. See draft Local Plan policy LP 12 on Green Infrastructure
21.	Andrew Payne, Greater London Authority, Mayor of London	Support a policy that continues to protect Metropolitan Open Land, in line with Green Belt policy, as well as a green infrastructure approach to open space as set out in London Plan policy 2.18. Support for aligning sport and recreation with health.	Noted. See draft Local Plan policy LP 13 on Green Belt and Metropolitan Open Land.
25.	Andy Sutch, Sport Richmond	The updated Open Space, Sport and Recreation needs and Opportunities Assessment was welcomed and the key findings are supported. This has to be viewed in light of new Government	Comments noted. See draft Local Plan policy LP 31 on Public Open Space, Play Space, Sport and Recreation and draft policy LP 30 on

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		Strategy for an Active Nation, any subsequent emerging strategies from Sport England and any pan-London proposals from London Sport. Intention for not reviewing MOL and Green Belt is welcomed. New government strategy identifies the need to increase the number of people playing sport, with priority to those groups in the community that tend not to take part in sport (women and girls, disabled people, lower socio economic groups and older people). It also focuses on outcomes such as physical and mental wellbeing, and social cohesion. This should be reflected in Local Plan.	Health and Wellbeing, which promotes and encourages active and healthy lifestyles.
25.	Andy Sutch, Sport Richmond	Concerns regarding approach to the determination of planning application for the lighting of sports facilities. Council has taken insufficient note of its Playing Pitch Strategy and the recent emphasis on the importance of physical activity for those aged over 40 as well as young people. The absence of lit outdoor facilities means in effect no weekday opportunity for participation by adults in employment. Provision of adequate lighting for training and community use should be the default position for investment in all future all weather pitches.	Comments noted. See draft Local Plan Policy LP 9 on Floodlighting, which now specifically refers to the Playing Pitch Strategy.
37.	James Sinclair, Teddington Society	Biodiversity and open land protection should be extended beyond the scope of national and regional guidance. Green infrastructure should not just been seen as a strategic framework; it should be made clear that development in certain designated areas will not be permitted.	Comments noted. See draft Local Plan policy LP 12 on Green Infrastructure, which confirms that this relates to all elements and assets that make up the wider green infrastructure network, not just those of strategic importance.
41.	Rebecca Bilfinger, GVA obo Lady Eleanor Holles School	In the context of increasing pressure on school places and the policy support (at all levels) for the provision of education facilities, Policy DM OS2 should include an exception clause for educational uses (where it can be demonstrated that there is a clear need for development). DM OS 2 is too protectionist in the context of the pro-development policies relating to education facilities. Despite the clear policy support for the expansion of education facilities, the development of many school sites in LB Richmond is constrained by the MOL designation. This strategic policy conflict, between education provision and Metropolitan Open Land, presents a significant obstacle in the local authority's ability to implement planning policies relating to education provision. Policy DM OS2 could be amended to state: 'Where need can be demonstrated for the expansion of an education facility, and there is no reasonable alternative location for that facility, the development proposal will be treated as very special circumstances'. The Council does not propose to review MOL boundaries as part of	The Council notes the Lady Eleanor Holles School's comments in relation to the Metropolitan Open Land policy. We disagree with the statement that there is a 'strategic policy conflict' as the Local Plan as well as the NPPF need to be taken as a whole and a balanced and informed judgement will need to be made on a site-by-site basis where there are differing priorities. In relation to the suggested MOL boundary review, it should be noted that not the entire site occupied by the Lady Eleanor Holles School is designated MOL – there is a substantial area in the middle of the site, which contains the existing school buildings including some adjoining open land (to the north east), which is not designated MOL. As such, there is significant scope for a comprehensive approach to redevelopment and/or expansion, without encroaching into protected MOL. The new draft policy LP 13 on Green Belt and Metropolitan Open Land also recognises that where a comprehensive approach to

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		the new Local Plan, with the exception of the MOL boundary at Harroddian School in Barnes. It is suggested to review such boundaries where a clear need can be demonstrated, no alternative sites are available, the land designation conflicts with MOL criteria, or there is a planning case to justify the release of that part of the MOL designation for education-related development.	redevelopment can be taken, such as on major schemes or regeneration proposals that deliver significant wider public benefits, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness. The applicant will need to demonstrate this as part of the argument to justify that 'very special circumstances' may exist. Therefore, if the School wants to propose development or extensions within designated MOL, this should be assessed as part of a planning application; any such application would be assessed against MOL policies, including the NPPF policy on Green Belt, which allow for some exceptions to be made if the proposals are for small-scale extensions; if the proposals would not qualify for an exception to policy, an applicant would have to demonstrate that 'very special circumstances' exist that may justify this development in MOL. The Council would give substantial weight to any harm to MOL and 'very special circumstances' would not exist unless the potential harm is clearly outweighed by other considerations.
42.	Andrew Dorrian, Transport for London Planning	The release of MOL in special circumstances is recognised for example in cases of school expansion. TfL request that the transport impacts of onward development are considered at the outset, to ensure sustainable transport options are available, together with mitigation on existing modes.	It should be noted that the Council is not proposing to release MOL as part of the Local Plan Review. See draft Local Plan policy LP 44 on Facilitating Sustainable Travel Choices. It should be noted that if sufficient additional school places cannot be provided locally, then children and young people would have much longer home-to-school journeys, which would have far more impact upon roads and other transport infrastructure.
42.	Andrew Dorrian, Transport for London Planning	TfL supports the proposal to strengthen protection to wharves. LB Richmond is recommended to consider the Thames Strategy for the area when defining the policies as noted by London Plan policy 7.29 and the rationale for review as per policy DM OS 11.	Support noted.
44.	Rebecca Pullinger, Campaign to Protect Rural England (CPRE)	Concerned of Council's statement that current policy "allows for flexibility or exceptions where required for example in the case of school expansion proposals on MOL." This is not the case: Richmond's current Local Plan states that development on MOL is only allowable in 'very special circumstances' and the criteria listed do not exempt school expansions from this. It is our understanding	Comments noted. See new draft policy LP 13 on Green Belt and Metropolitan Open Land, which is considered to be consistent with national and regional policy guidance.

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		that general pressures such as the need for school expansion do not constitute the very special circumstance required to justify development on MOL. In our view this text should be removed to ensure it is consistent with national and London policy which does not support exceptions based on generalised pressures.	
44.	Rebecca Pullinger, Campaign to Protect Rural England (CPRE)	Support for the introduction of a Green Infrastructure policy, which will help connect a range of current Local Plan policies, leading to the better protection of Richmond's multi-functional networks of open spaces and green corridors as well as the potential for sustainable travel plans for example.	Supported noted. See draft Local Plan policy LP 12 on Green Infrastructure.
44.	Rebecca Pullinger, Campaign to Protect Rural England (CPRE)	Support for the protection and enhancement of the sports grounds and other open spaces across the Borough.	Support noted. See draft Local Plan policy LP 31 on Public Open Space, Play Space, Sport and Recreation
50.	RPS Planning and development on behalf of S. Oxley	Disagree with statement that local policy on MOL is in line with national/regional policy guidance as there should be a specific review of land designated as MOL. Such a review is considered to be consistent with paragraph 8.3 of the National Planning Policy Framework (NPPF), which states that "Green Belt boundaries [and MOL] should only be altered in exceptional circumstances, through the preparation of review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.	National guidance on Green Belt states that Green Belt boundaries [and MOL] should only be altered in exceptional circumstances. The draft Local Plan's Spatial Strategy states that the borough's parks and open spaces provide not only recreational opportunities for those that live and work in this borough, but also for local communities and residents in neighbouring and other London boroughs, thus providing the green lung for south/west London. In addition, it demonstrates that the Borough can meet its housing needs without releasing open land that is protected by designations such as Green Belt or Metropolitan Open Land.
51.	Tim Catchpole, Mortlake with East Sheen Society	Our area, which includes Palewell Common, Sheen Common and much of Richmond Park, is well provided in this regard and accordingly we have no comment.	Noted.
54.	Cllr Martin Elengorn obo Liberal Dem Group of Councillors	CP4 – Biodiversity policies should be strengthened with, for example, greater emphasis on green corridors/chains. We note that para 114 of the NPPF favours a strategic approach to these issues and this should be adopted.	Noted. See draft Local Plan policy LP 12 on Green Infrastructure and draft Policy LP 15 on Biodiversity.
54.	Cllr Martin Elengorn obo Liberal Dem Group of Councillors	The suggested additional criterion on floodlighting should not be used to justify greater light pollution or impact on residents or harm to local biodiversity	Noted. See draft Local Plan Policy LP 9 on Floodlighting.
54.	Cllr Martin Elengorn obo Liberal Dem Group of Councillors	A more appropriate balance between access and protecting biodiversity needs to be struck on the Thames and other rivers, bearing in mind the fragility of our natural environment, the habitats on which often rare species depend and the advice of the Thames Landscape Strategy.	Noted. See draft Local Plan policies LP 12 on Green Infrastructure, LP 15 on Biodiversity and LP 18 on River Corridors, which will ensure that an appropriate balance will be struck between access to the River Thames and protecting biodiversity.

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
58.	Katie Brown, Nathaniel Lichfield & Partners obo St Mary's University	DM OS 2 – we consider some release of MOL may be justified to deliver comprehensive redevelopment sites, especially when this is facilitated through a Masterplan (e.g. St Mary's University)	National guidance on Green Belt states that Green Belt boundaries [and MOL] should only be altered in exceptional circumstances. The new draft policy LP 13 on Green Belt and Metropolitan Open Land recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals that deliver significant wider public benefits, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness. The applicant will need to demonstrate this as part of the argument to justify that 'very special circumstances' may exist.
58.	Katie Brown, Nathaniel Lichfield & Partners obo St Mary's University	DM OS 9 – St Mary's University has a number of important sports and recreational facilities within the borough. These require floodlighting to ensure their effective operation and we agree a more relaxed approach to their erection is appropriate where they serve an important need.	Noted. See draft Local Plan Policy LP 9 on Floodlighting.
64.	Tor Baret, Nathaniel Lichfield & Partners obo The Harrodian School	Harrodian School supports the principle of reviewing the existing MOL policy, in particular in relation to exceptions and flexibility in relation to major schemes, such as educational uses. The School encourages the incorporation of additional guidance in Policy DM OS2 in relation to school expansion and redistribution of open land. This approach would acknowledge the need to plan positively for education uses which are constrained by MOL. The policy should therefore explicitly refer to the acceptability of school expansion in the MOL and redistribution of open land for education use.	Support noted. The new draft policy LP 13 on Green Belt and Metropolitan Open Land recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals that deliver significant wider public benefits, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness. The applicant will need to demonstrate this as part of the argument to justify that 'very special circumstances' may exist.
68.	Robert Mackenzie, RPS obo Richmond-Upon-Thames College	DM OS 8 – While the College supports the retention of the special protection and presumption against the loss of playing fields, any amendments to the policy should go further than simply referring to the NPPF and Sport England's policy on assessing special circumstance. At very least the policy should recognise that in special circumstances the redevelopment of playing fields will be permitted. The policy should also include the three special circumstance provided in the NPPF: 1. An assessment has been undertaken has clearly shown the open space, buildings or land to be surplus to requirements; or 2. the loss resulting from the proposed development would be	Comments noted. See draft Local Plan policy LP 31 on Public Open Space, Play Space, Sport and Recreation, which includes specific guidance on assessing proposals that could affect playing fields, including reference to the guidance set out in the NPPF as well as Sport England policy.

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		<p>replaced by equivalent or better provision in terms of quantity in a suitable location; or</p> <p>3. the development is for alternative sport and recreational provision, the needs for which clearly outweigh the loss.</p> <p>The policy should also include Sport England's five exceptions to the loss of playing fields. This will provide clarity for the redevelopment of an existing playing fields as well as ensuring the policy is in accordance with Government guidance.</p>	
68.	Robert Mackenzie, RPS obo Richmond-Upon-Thames College	<p>CP12 – The College recognising that while it is important to protect, improve and enhance the River Crane corridor the policy requires specific guidance on what improvements should be made. The College also agrees that the policy requires updating to accurately reflect the status and progress on the development sites included in the Crane Valley SPG.</p>	Noted. See draft Local Plan policy LP 18 on River Corridors, in which updates have been made in relation to the River Crane.
73.	Lucy Gate, Public Health, London Borough of Richmond upon Thames	DM OS 6 / DM OS 7 – recognise importance of open space for play and recreation	Noted. See draft Local Plan policy LP 31 on Public Open Space, Play Space, Sport and Recreation, which also recognises Planning's role in contributing to healthy and active lifestyles.
73.	Lucy Gate, Public Health, London Borough of Richmond upon Thames	DM OS 12 – consider reference to Healthy Weight Environment TCPA PHE Planning guidance and the importance of walkways, which are safe and welcoming for physical activity and play	See draft Local Plan policy LP 30 on Health and Wellbeing, which promotes and encourages active and healthy lifestyles, and includes references to LP 31 on Public Open Space, Play Space, Sport and Recreation. The TCPA guidance has been used to inform the Local Plan and its Spatial Strategy.
76.	James Togher, Environment Agency	Support introduction of a new Green Infrastructure policy, which should reflect upon all of the benefits of GI, both social and environmental. It should ensure all development retains and reinforces green spaces and where possible creates links within and to the GI network. This policy could be incorporated with DM OS 6.	Support noted. See the draft Local Plan policy LP 12 on Green Infrastructure.
76.	James Togher, Environment Agency	DM OS 9 – we welcome the consideration of the effect of flood lighting on biodiversity but this shouldn't be constrained to designated sites. Reference should also be made to consideration of impacts on the river corridors and species such as bats whose foraging and commuting lines are affected by lighting.	Comments noted. See draft Local Plan policies LP 12 on Green Infrastructure, LP 15 on Biodiversity and LP 18 on River Corridors, all of which ensure that the need to protect biodiversity applies also on non-designated sites.
76.	James Togher, Environment Agency	Consolidating CP4 and DM OS 5 is supported provided it can be differentiated as to how biodiversity will be protected within designated sites and how it will be protected within the wider environment (e.g. GI policy). There could be more emphasis on how biodiversity will be protected and enhanced within the planning process, e.g. by not permitting	Comments noted. See draft Local Plan policies LP 12 on Green Infrastructure, LP 15 on Biodiversity and LP 18 on River Corridors. It is therefore considered that the approach to the protection of biodiversity is now clearly set out and strengthened.

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		development that affects sites and species of international and national importance and requiring ecological reports to be submitted alongside proposals to demonstrate how impacts on a designated site/habitat/species can be mitigated/compensated for to achieve an overall net gain in biodiversity. Biodiversity should also be integrated into CP3, DM SD4, SD5, SD 7 (align with WFD and biodiversity enhancements).	

Transport

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
5.	Lucy Owen, Port of London Authority	Update of transport policies to specifically encourage river transport in line with the London Plan's Blue Ribbon Network policies for passengers, tourism and freight transport would be welcomed. This should also refer to maximising use of the river during construction where practicable.	See draft Local Plan policy LP 44 on Facilitating Sustainable Travel Choices, which specifically covers river transport. In addition, new draft policy LP 24 on Waste Management states that development proposals, where appropriate, should make use of the rail and the waterway network for the transportation of construction, demolition and other waste.
5.	Lucy Owen, Port of London Authority	Support for the identification and protection of wharves for the shipment of freight.	Support noted.
5.	Lucy Owen, Port of London Authority	The PLA is currently unaware of any proposals for foot/cycle bridges across the River Thames and would wish to understand the evidence that the Council has to justify any particular crossing in any particular area.	This is set out in the Council's Infrastructure Delivery Plan and Infrastructure Delivery Schedule. See section 13.2 of the draft Plan.
10.	Philip Robin	Lock up garages should be protected as they provide car parking without cluttering streets and many garages are used for storage by local shops and residents.	Comments noted. See draft policy LP 45 on Parking Standards and Servicing.
10.	Philip Robin	DM TP8 – fully agree that the Borough needs to ensure adequate parking to minimise impact on street congestion and amenity. The GLA policy to limit parking as a means of reducing use of the car and encourage walking and cycling is completely unjustified by evidence. Traffic generation of residential development is not directly related to car parking provision – a more sophisticated approach is needed that recognises that many people only use their cars occasionally, and use public transport on a daily basis.	Support noted. See draft policy LP 45 on Parking Standards and Servicing.
10.	Philip Robin	Consideration should be given to traffic calming measures, through public realm enhancement, 20mph speed limits etc.	Traffic calming measures are not elements for the Local Plan. However, such measures and other schemes may be

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
			referred to in the forthcoming SPD on Sustainable Transport Choices.
10.	Philip Robin	There should be increased priority for pedestrians and cyclists; this means making improved provision (not just words of good intention).	See draft Local Plan policy LP 44 on Facilitating Sustainable Travel Choices, which specifically covers walking and cycling.
13.	Neil Wilton	CP5 / cycling: Whitton High Street has insufficient cycle parking distributed throughout, even following the Whitton Uplift programme (there appears to be less than prior to Uplift; bikes secured to street furniture etc.)	Comments noted. This is not a matter for the Local Plan and would need to be addressed in other Council plans and strategies, such as in the Local Implementation Plan on transport.
36.	Andree Frieze	<p>To tackle air pollution, consider the following measures:</p> <ul style="list-style-type: none"> • Improve cycling infrastructure, bike lanes and storage in to and out of railway stations; e.g. direct cyclists from Ham to Richmond station and vice versa, down Quadrant Road (against the one-way flow) on to Duke Street (against the one-way flow) and on to The Green towards the tow path. • Incentivise people to cycle into shopping centres by giving them 10% discount in local shops/discount in bike shops. Drivers get 30mins free parking which encourages people to drive. • Introduce a cycle hire scheme at stations, prime residential locations and retail hubs across the borough (similar to the Boris bikes in central London) • Start campaigns in relation to: 'Richmond Welcomes Cyclists'; 'Richmond welcomes pedestrians'; 'Richmond Welcomes Electric Vehicles' • Ban and fine taxi cabs from idling outside Richmond station • Ban and fine drivers from idling unnecessarily, e.g. as implemented by Islington Council • Bring in car-free Sundays to Richmond town centre and other areas e.g. Barnes, once a month • Introduce electric charging points in all car parks (street and off-road/supermarket) across LBRUT • Encourage businesses to introduce car clubs and prioritise electric vehicles; require charging points and replace a number of car parking spaces for cycle parking instead • Work with cab companies and bus firms to introduce electric vehicles throughout their fleets • Set up an electric hail-and-ride mini-bus service (that welcomes dogs) from Richmond and East Sheen stations to/from the gates to Richmond Park to encourage people to leave their cars at 	<p>Comments noted. The majority of the comments are not matters for the Local Plan and would need to be addressed in other Council plans and strategies, such as in the Local Implementation Plan on transport.</p> <p>It should also be noted that this draft Local Plan introduces a new policy on Local Environmental Impacts, Pollution and Land Contamination (LP 10), which also clearly addresses air pollution.</p>

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		<p>home</p> <ul style="list-style-type: none"> Bring in 20mph across all roads in the borough, except major trunk roads e.g. A316, to improve safety, encourage people to walk/cycle and reduce the amount of cars on our road. The City of London has produced a useful document on ways businesses can be encouraged to reduce pollution 	
42.	Andrew Dorrian, Transport for London Planning	<p>Overall, TfL is supportive of the approach to this revision of the local plan which is in general conformity with London Plan policies. Further discussions are requested with the council around growth scenarios for Crossrail 2, wording around future infrastructure projects and details around a separate SPD to incorporate transport standards.</p> <ul style="list-style-type: none"> The 2050 Infrastructure Plan can be referred to in preparing the plan; TfL is also undertaking research around parking design and further work around accessibility to the network in relation to density levels. Outputs from this work can be forwarded to the Council to assist in the preparation of the plan. Emphasis placed on the relationship between transport infrastructure and housing development. TfL is keen to investigate with the Council any opportunities for developing homes along transport corridors or around transport nodes. As part of this process it will be important to establish funding mechanisms to capture land value to help pay for future infrastructure funding, either through conventional s106 and CIL or other means. Crossrail 2: this includes 4 stations within LB Richmond, (Hampton Wick, Teddington, Fullwell, and Hampton). In making the case for Crossrail 2, it is important to demonstrate the additional housing and economic development opportunities that could be realised as a result of investment in the scheme. It is therefore important that the transport benefits of Crossrail 2 and any associated development opportunities are identified early and acknowledged within emerging local planning frameworks. TfL is keen to explore sites within a 1km radius of these four stations to capture the growth potential that scheme could deliver, through increased density, intensification, land use changes or over station development. TfL has undertaken an initial study and would be please to share the results with the Council to help inform further exploration through the development of this plan, as well as shaping the London Plan 	<p>The comments are very helpful and appreciated. They have been used to inform the new revised transport policies – see draft Local Plan policies LP 44 on Facilitating Sustainable Travel Choices as well as LP 45 on Parking Standards and Servicing.</p> <p>In addition, Section 13 of the draft Local Plan on Implementation, which also focuses on infrastructure delivery and summarises the Council's evidence base in relation to its Infrastructure Delivery Plan and Infrastructure Delivery Schedule, which contain the detailed transport infrastructure projects.</p>

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		<p>and MTS.</p> <ul style="list-style-type: none"> • A316 Highway Study: TfL is currently exploring corridor improvements for the A316 between Chaulkers Corner and Hospital Bridge Road. A corridor plan is being devised which explores the top priorities for improvements, building on current and planned schemes as well as future potential schemes. As within our analysis of growth areas, many sites along the A316 will significantly benefit from these improvements. This study and its improvements should be referred to in the plan and it is expected that developments along the A316 contribute appropriately, (financially and in their design) towards the delivery of agreed projects. <p>The proposed approach to reviewing the transport policies is extremely positive with the main focus on the high trip generating uses being located in the most accessible locations.</p> <p><i>DMTP2</i> – It is agreed that detailed standards for Travel Plans, Construction Logistics Plans and Delivery and Servicing Plans could be included in a Supplementary Planning Document. A reference should remain with the Local Plan DM policy. TfL would be keen to explore the SPD wording with the council, in relation to existing TfL guidance to make it effective.</p> <p><i>DMTP5</i> – The Council proposes to remove this policy and integrate it into strategic policies. In principle, TfL has no objection to this proposal. The redrafted policy should ensure that taxis and private hire vehicles are adequately catered for in appropriate locations (e.g. stations, town centres and hotels). The TfL Ranks Action Plan (2015) should be referred to when planning for taxi provision.</p> <p><i>CP5</i> – TfL welcomes signposting regional infrastructure projects within the implementation section or Infrastructure Delivery Plan (IDP). Signposting regional infrastructure project, identified through the South Sub regional Transport Plan process will be important, together with delivery methods. TfL understands the council's view on striking the right balance in order to make the plan future proof and would be interested in exploring wording matter further with the council. A delivery matrix grouping projects into temporal periods, such as table 6.1 of the London Plan could be effective in this regard. Reference to major projects such as Crossrail 2, A316 highways scheme, town centre urban realm schemes and any river crossings are recommended to be included within the IDP.</p> <p><i>DMTP 3; CP5, 5C</i> – TfL supports the enhancement of local cycling</p>	

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		<p>and walking routes including the delivery of new river walkways and new bridges across the Thames. These projects should be developed in consultation with stakeholders. The proposal to consolidate Cycling and Walking policies into CP5 is supported. The latest cycle parking standards from the London Plan (2015) should be reflected in the policy.</p> <p><i>DMTP 6</i> – The Council should refer to the latest Streetscape Guidance and introduce the promotion of Legible London.</p> <p><i>CP5.F</i> – TfL supports car free schemes. All standards should take account of latest London Plan standards to strike an appropriate balance. An approach to setting standards should be based on accessibility and dependency on the car as identified in MALP.</p> <p><i>DMTP9</i> – TfL has guidance around parking space design for spaces where they are proposed to be accessed from the TLRN.</p>	
51.	Tim Catchpole, Mortlake with East Sheen Society	We are pleased to see a reference to 'minimising the downtime at level crossings'. This is a major issue in Mortlake and East Sheen and will become even more so with traffic generation from the redevelopment of the Mortlake Brewery site and with any future development of a Heathrow-Waterloo express.	Comment noted. See Section 13 of the draft Local Plan on Implementation, which focuses on infrastructure delivery and summarises the Council's evidence base in relation to its Infrastructure Delivery Plan and Infrastructure Delivery Schedule, which contain the detailed transport infrastructure projects.
54.	Cllr Martin Elengorn obo Liberal Dem Group of Councillors	<p>DM TP 2 – A more robust approach is needed where Travel Plans are not proving effective.</p> <p>CP5 and DM TP 6 – A more focussed approach to pedestrian safety and convenience is required throughout the borough.</p> <p>CP 5 – more emphasis needed on convenient location of bus stops</p>	Comments noted. See draft Local Plan policies LP 44 on Facilitating Sustainable Travel Choices and LP 45 on Parking Standards and Servicing. Detailed transport matters will also be considered in the forthcoming SPD on Sustainable Transport Choices.
56.	Cllr Liz Jaeger	DM TP8 & DM TP9 – need for protection of shared driveways from being built on (problem occurred in Crane Way, Whitton).	Comment noted.
73.	Lucy Gate, Public Health, London Borough of Richmond upon Thames	<p>CP5 – consider Healthy Weight Environment TCPA PHE Planning guidance and the importance of walkways for physical active and sustainable environment; also include the GLA Sustainable transport plan</p> <p>DM TP 7 – consider importance of cycling routes, lit cyclepaths for providing active environment</p>	<p>See draft Local Plan policy LP 30 on Health and Wellbeing, which promotes and encourages active and healthy lifestyles, and includes references to LP 31 on Public Open Space, Play Space, Sport and Recreation. In addition, draft Local Plan policy LP 44 on Facilitating Sustainable Travel Choices also focuses on promoting and encouraging cycling and walking.</p> <p>The TCPA guidance has been used to inform the Local Plan and its Spatial Strategy.</p>

Housing and Affordable Housing

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
6.	Caroline Brock, Kew Society	Support for the commitment to give communities access to financial viability data; this should be made available at the same time as the planning application is submitted. Not clear on how social housing will be addressed to ensure social sustainability. Broadly agree with SHMA proposals, but rising prices for purchase or private rental are a concern, including the difficulties that arise for housing of key workers.	Note support for a transparent approach to viability assessments. Policies continue to seek mixed and balanced communities, taking account of NPPF definition of affordable housing. Affordability concerns are recognised. The Government approach is to promote Starter Homes, intermediate housing and the Private Rented Sector. See draft Local Plan policy LP 36 on Affordable Housing.
10.	Philip Robin	DM HO2 and HO3 – residential land values encourage the redevelopment of every scrap of land, e.g. lock up garages. It is not clear whether this is infill or back land development, but there needs to be a policy to recognise that such facilities should be protected.	Other policies may seek to protect existing uses which would need to be addressed first and the approach to viability is to ensure that site land values reflect policy requirements. See draft Local Plan policies LP 39 Infill, Backland and Backgarden Development which can apply to a range of different types of sites.
10.	Philip Robin	CP15 – providing affordable housing should be a top priority in a high value Borough like Richmond. Council is letting developers get away with limited or no provision, through the use of “viability appraisals” that are not subject to public scrutiny. The Council must have policies whereby a proper viability assessment is undertaken, with clawback provisions.	Recognised as a priority, however national policy refers to viability and the Council robustly scrutinises site assessments. Note support for a transparent approach to viability assessments and seeking clawback reviews. See draft Local Plan policy LP 36 on Affordable Housing.
21.	Andrew Payne, Greater London Authority, Mayor of London	Support for recognition that Richmond’s Local Plan will have to reference its minimum housing monitoring target. However, this should be seen as a minimum figure; borough should seek to bring forward additional housing development. Reference to FALP Inspector’s report is noted, however, irrespective of this, boroughs are still required to seek to augment targets to address need. Support the proposal for a borough SHMA to inform the housing target. The minimum supply target should be supplemented with additional housing capacity from the types of location outlined in London Plan Policy 3.3E (i.e. town centres, surplus industrial, commercial and public land and other large sites, especially near transport nodes as well as general intensification and sensitive intensification of residential areas, especially in areas of good public transport accessibility) in order to close the gap between identified need and capacity. Pro-active and targeted re-appraisal of a borough’s SHLAA findings, drawing on scenario tests, supplemented by more local sensitivity testing. The borough will have to satisfy itself it can demonstrate it has looked at all options for housing delivery in order to meet demand and to protect other designated land.	Policies continue to reflect expectation that minimum target will be exceeded. There are limited opportunities to augment supply given lack of sites, other priority uses such as education, and constraints such as flood risk. Taking account of the draft SHMA, the spatial strategy and site allocations set out to demonstrate the borough’s capacity for future housing. See draft Local Plan policy LP 34 New Housing.

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
21.	Andrew Payne, Greater London Authority, Mayor of London	Local Plan should identify and set policies to address the need for specialist older person's accommodation and this should be informed by Richmond's indicative annualised strategic benchmark for specialist housing for older people.	The Council has previously raised concerns that the benchmark target for specialist housing for older people (135 per annum, of which 105 private, 30 intermediate) corresponds to almost half of the overall housing target and effectively overrides other needs which cannot be met due to capacity constraints. The Assessment of Potential Demand had fundamental limitations including the assumption that 50% of affordable housing stock is not fit for purpose and that a specific proportion of elderly will choose this type of housing when there is a wide choice of accessible easy to run flats available. Targets should be based on local evidence of needs, in particular recognition of existing supply and its potential to be re-modelled to meet the current requirements for specialist housing. The Council's research suggests a range of factors influence housing moves and priority is towards helping people to remain in their existing homes with support, with higher priority to develop extra care housing (research published 2016 recommends 81 units over 2-3 schemes) rather than sheltered units and/or retirement homes. The draft SHMA has informed a balanced approach to meeting needs for different types of housing. See draft Local Plan policy LP 37 Housing Needs of Different Groups.
34.	Mary Stephens	Severe shortage of social housing and affordable housing, and an excess of luxury housing in the borough; this needs to be addressed as a matter of urgency.	Affordability concerns are recognised. The draft SHMA has informed a balanced approach to meeting needs for different types of housing. See draft Local Plan policy LP 36 on Affordable Housing.
54.	Cllr Martin Elengorn obo Liberal Dem Group of Councillors	DM HO 01 – need to quantify loss of less expensive housing through allowing larger houses to revert to single family use and consider re-introducing previous policy. CP15 and DM HO6 – need to explore all means of producing a greater proportion of affordable housing, particularly social rented – need to place greater emphasis on preference for on-site provision and making viability calculations and negotiations public.	Noted. The draft SHMA has informed a balanced approach to meeting needs for different types of housing. See draft Local Plan policy LP 38 Loss of Housing and other housing policies. Policies continue to seek mixed and balanced communities and preference for on-site provision; have to take account of NPPF definition of affordable housing. See draft Local Plan policy LP 36 on Affordable Housing.
61.	Louise Spalding, Defence Infrastructure Organisation	The inclusion of the SHMA is welcomed, which needs to be compatible with the GLA studies and findings.	Noted.
73.	Lucy Gate, Public Health, London	Consider 'Dementia Friendly Environments' within housing policies, including the importance for falls prevention and keeping people	The draft SHMA has informed a balanced approach to meeting needs for different types of housing including for

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
	Borough of Richmond upon Thames	independent for longer; could add reference to Fuel poverty.	older people. See draft Local Plan policy LP 37 Housing Needs of Different Groups and policy LP 30 Health and Wellbeing. See also comment ref. no 21. In relation to older person's accommodation.

Social Infrastructure, Education, Health and Wellbeing

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
3.	Raakhee Patel, Sport England	Support; Sport England welcomes the priority to tackle health inequalities and recommends inclusion of a broad range of sporting and fitness facilities and activities, and Sport England policy objective 18 , which aims to promote the use of planning obligations as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance. <u>Regulation 123 List</u> The revised Playing Pitch Strategy that is being produced for the borough will help the Council determine what sports infrastructure is required for playing fields and also inform the sporting needs arising from strategic development sites. Sport England would recommend the Council ensure that the outputs from this work can be fed into the Council's Regulation 123 List.	Support noted. See draft Local Plan policy LP 31 on Public Open Space, Play Space, Sport and Recreation as well as draft Local Plan policy LP 30 on Health and Wellbeing. The process of reviewing and updating the Council's CIL Regulation 123 List is separate to the Local Plan Review.
6.	Caroline Brock, Kew Society	Could the approach of protecting key office and employment areas also be applied to small local community facilities such as artist studios, sports venues etc.?	Comments noted. Please refer to the draft new Local Plan policy LP 28 on Social and Community Infrastructure, which applies to a variety of community facilities.
12.	Ross Anthony, Theatres Trust	The Trust agrees that Policy DM SI2 needs to be updated to reflect guidance about the promotion of culture. NPPF requires Local Plan to include policies to promote and protect cultural facilities, and guard against unnecessary loss of valued facilities. Recommend renaming the policy to 'Protection of community (and cultural) facilities'. Glossary and accompanying text should be updated to: <i>community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community.</i> The following policy on 'Protection of community facilities' is recommended: <i>"The council will resist the loss or change of use of existing community facilities unless replacement facilities are provided on site or within the vicinity which meet the needs of the local population, or the necessary services can be delivered from</i>	The comments have been used to inform the new revised Local Plan policy LP 28 on Social and Community Infrastructure.

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		<p><i>other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no community need for the facility or demand for another community use on site. In regards to the wording of the proposed policy, we caution against the use of 'viable' as many community and cultural facilities are run by charities, community and volunteer groups and are not considered 'viable' in developer terms, but are essential community infrastructure for the health and well-being of local communities. We recommend use of the phrase 'there is no longer a community need', rather than the term viable."</i></p> <p>We also recommend policy DM TC 5 relating to town centres is also updated to support and protect community and cultural facilities.</p>	
21.	Andrew Payne, Greater London Authority, Mayor of London	Support for aligning health with sport and recreation.	Supported noted.
40.	Diana Collins	Where permission is granted for residential use, particularly within large developments, provision must be made for schools either within the site or on a suitable alternative site.	Comment noted. See the draft Local Plan policy LP 29 on Education and Training, which will ensure that impacts of new developments are assessed and taken account of.
41.	Rebecca Bilfinger, GVA obo Lady Eleanor Holles School	<p>CP18 should be updated to more accurately reflect local needs and it should address the need for <i>all</i> school places, including at independent schools as well as state-funded schools. The current evidence base considers only state schools and does not take account of the contribution made by schools such as LEHS. General evidence of education need as demonstrated in London Plan Policy 3.18, the Independent Schools Council and the GLA's 'Projected Demand for School Places' (2015) – demand for independent primary school places is projected to increase by 9.1% by 2019/20, and by 24% by 2024/25 for secondary school places. In a context of increasing need for school places, planning policies relating to education facilities at the national, strategic and local level are explicitly pro-development and do not distinguish between state-funded and independent schools. Evidence of need at LEHS demonstrates a clear need for the expansion of education facilities; the female population in the LEHS catchment area (including Richmond, Kingston, Hounslow, Runnymede, Elmbridge and Spelthorne) will rapidly increase between 2016/17 and 2026 for age groups 5-19. Nearby independent schools are full and currently run a waiting list. LEHS has had capacity to admit only a third of pupils that apply to the senior school.</p>	Comments noted. See the draft Local Plan policy LP 29 on Education and Training, which applies to the provision of facilities and services for education and training of all age groups. In addition, it states that 'The Council recognises that the independent sector makes a contribution to providing education facilities for the borough's children and young people. The Council is generally supportive of proposals, which increase the provision of places within that sector, provided they can evidence that they meet local need.'

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		In light of evidence that need is projected to increase for both state-funded <i>and</i> independent school places, LB Richmond's assessment of local need should address the increasing need for both state-funded <i>and</i> independent school places.	
51.	Tim Catchpole, Mortlake with East Sheen Society	We are concerned that the inclusion of state nursery schools is taking custom away from nurseries currently using the church halls in our area and that church hall use may decline as a result. This needs to be addressed.	Comment noted. There is an increasing need for additional school and nursery places across the borough. Demand for free early years places in the borough is very high and each of the maintained nurseries is currently oversubscribed. The extended free childcare entitlement for working parents of 3- and 4-year-olds, which provides eligible parents with a total of 30 hours of free childcare per week, will be a challenge for the Council. Although the Council's statutory duty regarding early years provision is to enable a sufficiency of places within the overall maintained and PVI (private, voluntary and independent) sectors, it remains the Council's aspiration to enable the provision of more maintained nursery places within the borough in response to the overall demand for more places <i>per se</i> . Also see the draft Local Plan policy LP 29 on Education and Training.
54.	Cllr Martin Elengorn obo Liberal Dem Group of Councillors	CP 18 – Council needs to devise strategies to identify/provide more school sites.	The Council and Achieving for Children work very closely with the Education Funding Agency, schools, diocesan boards of education and other partners to identify prospective sites for new schools and/or expansion of existing schools. The Council's School Place Planning Strategy 2015-2024 provides an overarching assessment of how the Council intends to address the need for additional school places. The draft Local Plan's site allocations as well as policy LP 29 on Education and Training identify Richmond College, Stag Brewery, Ryde House and Barnes Hospital as sites for educational use.
56.	Cllr Liz Jaeger	Consider what policies could have helped secure Ryde House and Udney Park for schools. Is there a role here for strategic compulsory purchase?	Comment noted. See the draft Local Plan's site allocations as well as policy LP 29 on Education and Training.
69.	Steve Simms, SSA obo Kentucky Fried Chicken (Great Britain) Limited	We disagree with the proposal to restrict the development of further 'fast food takeaways' in close proximity to schools where a concentration of such uses already exists. Evidence would be required that there is a link between the proximity of a particular	The Council and Achieving for Children strongly support the proposal and the implementation of the Government's School Food Plan. There is an emerging obesity issues in the borough,

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		<p>concentration of 'fast food takeaways' and the incidence of obesity, rather than a generic emerging obesity issue in the borough. Studies over the last decade have shown no correlation between proximity and incidence, indicating the opposite conclusion that, in fact, a causal link does not exist. This is because people with a variety of lifestyles, healthy and unhealthy, obtain a variety of foods, healthy and unhealthy, from a variety of sources, near and far from where they live, work, visit or study. As such lifestyles and food sources are so diverse that no one individual pathway has any particular influence. Consequently, overall policy should focus on education and planning policy on encouraging activity.</p> <p>The only evidence likely to support controls on concentration is the degree of variety necessary to support retail, rather than human, health. A specified threshold based on such retail evidence may be sound.</p>	<p>particularly in children. One established method of addressing obesity and reducing obesogenic environments is by restricting access to unhealthy foods, particularly fast food takeaways. Childhood obesity amongst school age children is a concern as it is known that obese children are more likely to be obese adults and are at increased risk of developing further health difficulties. Access to fast food takeaways detracts from the ability to adopt healthy lifestyles and undermines healthy eating initiatives that may be in place at the school.</p> <p>Aside from the increasingly prevalent obesity issue, research indicates that there is a causal link between high consumption of fast food and poor performance in educational examinations. In addition, research shows that there is a direct and substantial correlation between pupils' consumption of nutritionally-balanced lunches and their academic achievement.</p> <p>Therefore, draft policy LP 30 on Health and Wellbeing restricts fast food takeaways located within 400 metres of the boundaries of a primary or secondary school.</p>
73.	Lucy Gate, Public Health, London Borough of Richmond upon Thames	<p>CP 16 – could expand on examples such as dementia friendly villages and community champions; there is a requirement for the development of physical and social capital</p> <p>DM SI 1 – cross refer to CP 5 cycling and walking</p> <p>CP 17 – tackling obesity including cross reference to transport policies on walking; add 'Village Planning and Building Resilient Communities'; there is evidence that loneliness and isolation has a significant detrimental impact on physical and mental health. Social infrastructure and social capital in communities provides a sustainable and effective solution to this. In Richmond the Village planning process is being utilised to support the adoption of Dementia Friendly Environment and Communities.</p>	<p>Comments noted.</p> <p>See draft policy LP 30 on Health and Wellbeing, which encourages access to local community facilities, services and shops which encourage opportunities for social interaction and active living, as well as contributing to dementia-friendly environments.</p> <p>Draft policy LP 44 on Facilitating Sustainable Travel Choices encourages cycling and walking.</p>
75.	NHS England , NHS Property Services, Healthy Urban Development Unit (HUDU) and Richmond CCG	<p>We welcome the intention to update CP17 to recognise the role of planning to improve health, prevent ill-health and reduce health inequalities, including a new policy approach to restrict concentration and location of hot food takeaways.</p> <p>We support the requirement for Health Impact Assessment for major development proposals which should address the impact on healthcare services and wider health and wellbeing issues.</p> <p>We welcome the specific consideration given to the needs of older</p>	<p>Comments and support noted.</p> <p>See draft policy LP 30 on Health and Wellbeing, which incorporates the requirement for HIAs and restricts fast food takeaways located within 400 metres of the boundaries of a primary or secondary school.</p>

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		people, including the creation of dementia-friendly environments and would support a future supplementary planning document on Healthy Communities to reflect the updated policy.	

Employment, Businesses and Visitor Economy

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
6.	Caroline Brock, Kew Society	Support for aims of policies on key office and employment areas.	Support noted. See draft policies LP 40 on Employment and Local Economy, LP 41 on Offices and LP 42 on Industrial Land and Business Parks.
21.	Andrew Payne, Greater London Authority, Mayor of London	Support for policies that protect or promote locally and strategically important employment and industrial premises or areas. The London Plan identifies Richmond and Twickenham town centres as having the potential to accommodate speculative office space in the most accessible locations. However, this might entail some long-term loss of overall office stock on less attractive sites.	Support noted. See draft Local Plan policy LP 42 on Industrial Land and Business Parks. The Local Plan and Spatial Strategy taken as a whole set out the locations for new employment in the borough. This borough has potentially lost 81,978sqm of office floorspace, amounting to an estimated 28% of overall office floorspace in the borough (data last updated in February 2016). Draft Local Plan policy LP 41 on Offices seeks to prevent further loss of offices, particularly in areas designated as Key Office Areas, and encourages new office provision in the borough, particularly within the designated areas.
40.	Diana Collins	There should be more opposition to changing offices to residential use and more protection for small businesses.	Comments noted. The Council has already made two Article 4 Directions that remove the permitted development rights for B1 to C3 in certain key areas of the borough. In addition, draft Local Plan policy LP 41 on Offices seeks to prevent further loss of offices, particularly in areas designated as Key Office Areas, and encourages new office provision in the borough, particularly within the designated areas.
51.	Tim Catchpole, Mortlake with East Sheen Society	We support the Council's policies for the protection of employment floorspace.	Support noted.
67.	Alex Arrol, Goldcrest Land	Policy DM EM 2 should be revised because employment land forecasting models predict a gradual decline in demand for B2 uses and relatively flat demand for B8 uses up to 2026. A requirement for such a long marketing period in line with DM EM 2 for any site where	This borough has potentially lost 81,978sqm of office floorspace, amounting to an estimated 28% of overall office floorspace in the borough (data last updated in February 2016).

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		<p>employment was the last use is particularly inflexible given this anticipated trajectory of employment need for B2/B8 uses in the Borough. A shorter period of marketing of 12 months should be sought to demonstrate whether an existing employment site remains viable. In this way, there will still be strong protection of employment sites but where sites are no longer viable, it could play an important role in meeting the wider development needs of the Borough.</p> <p>The Council should also review its current policy seeking to secure a higher provision of affordable housing for employment sites being brought forward for non-employment use. Employment sites can be heavily contaminated resulting in significant remediation costs. If a developer is proposing a mixed-use scheme with employment uses on a former employment site, it is most likely because an employment only scheme is not viable. It therefore seems peculiar that the Council would seek a higher level of affordable housing on former employment sites than is sought through its general policy on affordable housing (CP15). Where an employment site is coming forward for alternative uses, or a mixed use employment scheme, it should be assessed against CP15 and the usual requirements that a viability appraisal be submitted if the development is proposing a lower level of affordable housing than required under policy CP15.</p>	<p>Extensive local research and evidence base has been produced, both in relation to offices as well as industrial land and business parks, which demonstrates and justifies the need to protect employment land in the borough in order to meet the anticipated growth in job numbers over the Plan period.</p> <p>Noted, however the Council's evidence suggests strong demand for employment space, see draft Local Plan policy LP40 Employment and Local Economy. Contamination would vary on a site by site basis and would be considered in any viability case, see draft Local Plan policy LP 36 on Affordable Housing.</p>

Comments on new policy areas, including basements:

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
6.	Caroline Brock, Kew Society	Proposal to establish a Scrutiny Panel on basement policy is supported. Basements continue to be a concern because of the size, effects on water courses and flooding and safety as witnessed in the recent house collapse in Barnes.	Support noted. The draft Local Plan contains a new Policy on Subterranean developments and basements (LP 11).
51.	Tim Catchpole, Mortlake with East Sheen Society	<p>Definition of 'sustainable development' – does this include creation or extension of a basement to provide a domestic cinema and/or gymnasium?</p> <p>Would like to see a system of compensation introduced for victimised neighbours.</p> <p>We are pleased to see that the Council has set up a Scrutiny Panel to investigate such developments in the Borough and we look forward to seeing their report.</p>	<p>Comment noted. 'Sustainable development' is defined in the NPPF and the Local Plan and Spatial Strategy taken as a whole show how it is expressed locally.</p> <p>Note that the draft Local Plan contains a new Policy on Subterranean developments and basements (LP 11).</p>

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
79.	David Shaw, The Alberts Community Association	We have recently been much involved in the debate over controls on basement developments – an issue that sent shock waves through our community as far as it affects our housing, constructed much as it is with minimal foundations and very thin party walls. This follows the Alberts' first approved planning application (13/0154/HOT) for a basement development. We therefore much welcome the document statement (Appendix 1, p31) that a scrutiny panel “will be set up to investigate basement developments in the borough” and would very much like to be involved in this process as an example, not untypical of many similar areas throughout the borough, of small Victorian terraced housing.	The draft Local Plan contains a new Policy on Subterranean developments and basements (LP 11).

Comments on proposed site allocations:

Hampton Square

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
30.	Kevin Rice, Hampton Society	Support for 4 key sites in Hampton (including Hampton Square, Hampton Traffic Unit, Hampton Delivery Office and Platts Eyot).	Support noted.
57.	Katherine Jones, Savills obo Thames Water	Due to the complexities of wastewater networks, the level of information available does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for the site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the wastewater infrastructure needs relating to the proposals in the Local Plan.	Comment noted. The draft Local Plan contains Policy LP 23 on Water Resources and Infrastructure. This states that new major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. This policy also requires applicants to provide evidence in the form of written confirmation from Thames Water as part of the planning application that capacity exists in the public sewerage and water supply network to serve their development.
76.	James Togher, Environment Agency	Flood Zone 1; no comments	Noted.

Hampton Delivery Office

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
30.	Kevin Rice, Hampton Society	Support for 4 key sites in Hampton (including Hampton Square, Hampton Traffic Unit, Hampton Delivery Office and Platts Eyot).	Support noted.
57.	Katherine Jones, Savills obo Thames Water	Thames Water has concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. In light of the capacity constraints, developers should provide a detailed drainage strategy, informing what infrastructure is required, where, when and how it will be delivered. Note that local network upgrades can take around 18 months to 3 years to design and deliver.	Comment noted. The draft Local Plan contains Policy LP 23 on Water Resources and Infrastructure. This states that new major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. This policy also requires applicants to provide evidence in the form of written confirmation from Thames Water as part of the planning application that capacity exists in the public sewerage and water supply network to serve their development.
76.	James Togher, Environment Agency	Flood Zone 1; contaminated land report required due to previous land uses	Noted.

Platts Eyot

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
22.	Kevin Scott Consultancy obo Port Hampton Estates Limited (Platts Eyot)	<p>Previously commented on the emerging Site Allocations Plan and the potential restrictions/contradictions set out in the text regarding the nature of the potential residential use, i.e. the policy should not seek to restrict the potential housing by focusing too closely on live work units and reference to resisting commuter housing is unclear and unhelpful. The text should be amended to refer to the potentially important role of residential development in securing the long term future of the site should be given greater prominence.</p> <p>The Council subsequently agreed the following change: Delete 'including live work units' and "rather than providing solely for commuters" and add <u>"The Council will consider preparing a Site Brief at an appropriate time in partnership with the owners."</u></p> <p>The current consultation has reverted to the original wording, which jeopardises the desire to see the island economically regenerated. Therefore, reference to 'live work' units should be removed along with reference to commuters and wording inserted as previously agreed in order that a development brief can now be brought forward in consultation.</p> <p>In addition, Port Hampton is addressing the future of Platts Eyot and has produced a draft development brief focussing on the viability and regeneration of the island, its listed buildings, buildings of townscape merit, boat building and repair businesses, slipways, leisure and B1 uses and the moorings noted to be of importance in the Conservation Area study. Several architectural practices have attended on site and provided development ideas. Port Hampton would now welcome the opportunity of consulting with the Council with a view to achieving all of the above with enabling residential development.</p>	The submitted comments have informed the revised wording for the site allocation for Platts Eyot, and references to 'live-work' units as well as 'solely providing for commuters' have been removed.
25.	Andy Sutch, Sport Richmond	Support site specific developments at St Mary's College, Pools on the Park and the Richmond Athletic sites, the boat house restoration on Platts Eyot and development at Harlequins and the RFU.	Support noted.
30.	Kevin Rice, Hampton Society	Support for 4 key sites in Hampton (including Hampton Square, Hampton Traffic Unit, Hampton Delivery Office and Platts Eyot).	Support noted.
57.	Katherine Jones, Savills obo Thames Water	<p>Thames Water has concerns regarding Wastewater Services in relation to Platt's Eyot. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development.</p> <p>In light of the capacity constraints, developers should provide a detailed drainage strategy, informing what infrastructure is required,</p>	Comment noted. The draft Local Plan contains Policy LP 23 on Water Resources and Infrastructure. This states that new major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. This policy also requires applicants to provide evidence in the form of written confirmation from Thames Water as part of the planning

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		where, when and how it will be delivered. Note that local network upgrades can take around 18 months to 3 years to design and deliver.	application that capacity exists in the public sewerage and water supply network to serve their development.
76.	James Togher, Environment Agency	Flood Zones 1, 2 and 3; the island is surrounded by the River Thames. Proposals for introducing new housing to this high flood risk island site may be inappropriate. Allocating this island site for new residential uses would need to follow Sequential test demonstrating no lower risk sites are available and would not result in increased risk to life/property and demands on the emergency service during a major flood event. Replacement/improvements to existing buildings should be resilient and informed by the latest flood risk and climate change evidence. The need to retain/improve boatyards/repairs workshops etc is supported. The need to retain the heritage value of buildings on this island is understood and it is suggested that alternative funding is sought for improving the island such as the Heritage Lottery funding sources rather than introducing new residential development.	Comments noted. A flood risk sequential test has been prepared to support the site allocations. The Council will work closely with the Environment Agency to understand the issues relating to the provision of safe access / egress to and from the island. It should be noted that other policies as set out in the draft Local Plan also apply and any proposal coming forward on this island would be assessed against all development plan policies.
78.	Katharine Fletcher, Historic England	The site allocations include Platts Eyot, where the boathouses are currently at risk. We would be pleased to discuss the heritage issues that the plan could include as guidance.	Comments noted. The site allocation refers to the need to ensure that properties on the Heritage at Risk register, together with the Conservation Area and the wider character of the island, are improved and enhanced.

Hampton Traffic Unit

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
30.	Kevin Rice, Hampton Society	Support for 4 key sites in Hampton (including Hampton Square, Hampton Traffic Unit, Hampton Delivery Office and Platts Eyot).	Support noted.
57.	Katherine Jones, Savills obo Thames Water	Thames Water has concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. In light of the capacity constraints, developers should provide a detailed drainage strategy, informing what infrastructure is required, where, when and how it will be delivered. Note that local network upgrades can take around 18 months to 3 years to design and deliver.	Comment noted. The draft Local Plan contains Policy LP 23 on Water Resources and Infrastructure. This states that new major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. This policy also requires applicants to provide evidence in the form of written confirmation from Thames Water as part of the planning application that capacity exists in the public sewerage and water supply network to serve their development.
74.	Greg Pitt, Barton Wilmore obo UK	Pre-application advice – Council officers have advised that residential use would be considered acceptable and that it would add to the	Comments noted. See draft Local Plan proposal site SA 3 Hampton Traffic

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
	Pacific Hampton Station LLP	<p>vitality and viability of the mixed use area. Planning application for 28 residential units has been submitted. Overwhelming preference from local resident's and Councillors is for residential development.</p> <p>Details of pre-application request and Council's response has been submitted, which confirms that the proposal meets DM SI 1. In May 2013, the Deputy Mayor for Policing and Crime (DMPC) approved the "in principle" disposal of the Hampton Traffic Unit with the expectation that its sale would be complete in 2014/2015. In March 2015, the MOPAC disposal schedule for 2014-2015 was published which listed those sites that, following being deemed surplus to requirements, were disposed of. This schedule notes that the sale of Hampton Traffic Unit was completed on 7th January 2015 indicating that, in accordance with the requirement of the DMPC.</p> <p>As part of the original marketing of the Hampton Traffic Unit by the MPS, pre-application advice was received on 4th July 2014 from the LBRuT in order to assess the site's potential for use as residential. The advice received noted that the loss of the police unit would constitute a loss of social infrastructure and, as such, Development Management Plan Policy DM SI2, which resists the loss of such infrastructure had to be considered. Evidence has been submitted as to why this asset does not technically fall under the definition of community infrastructure. Notwithstanding, the criteria of DM SI2 are being met. There is demonstrable evidence to illustrate that the existing facility was no longer needed by the MPS as it failed to meet their needs. Its re-provision elsewhere, as advocated by the DMPC as a condition of its sale, would not adversely impact any existing community provision or call-out response times as the facility itself provided neither public access nor a public contact point. It is considered that the site is suitable for a wholly residential development.</p>	<p>Unit, which states that 'Appropriate land uses include business (B1), employment generating and other commercial or social and community infrastructure uses. The Building of Townscape Merit has to be retained and a pedestrian link should be provided through the site.'</p> <p>The evidence suggests there is a need for employment generating and other commercial or social infrastructure uses in this area. If other employment generating, commercial and social infrastructure uses have been explored and options discounted in line with other policies, such as social infrastructure and employment policies, a residential-led scheme with affordable housing and on-site car parking would be appropriate.</p> <p>Site specific evidence submitted in support of pre-applications or at application stage will be considered as part of the DM process.</p>
76.	James Togher, Environment Agency	Flood Zone 1; contaminated land report required due to previous land uses	Noted.

Telephone Exchange, Teddington

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
57.	Katherine Jones, Savills obo Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted.

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
76.	James Togher, Environment Agency	Flood Zone 1; contaminated land report required due to previous land uses	Noted.

Strathmore Centre

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
38.	Krystyna Kujawska SCAMPS	In the event of the site's redevelopment, we have already provided a 'brief' of Scamps' exact needs, including all the services provided, to Ishbel Murray, Assistant Director of Environment at LBRT. Scamps provides a complete range of child-care services for children up to and including Year 6, as well as acting as a nursery to pre-school aged children. Scamps runs a breakfast club from 7.30am and an after-school childcare service until 6pm enabling working parents to complete a regular working day. Scamps also runs full child-care provision during the school holidays. As well as enabling over 200 local families to go out to work, this essential (non profit-making) service also employs over 25 staff. Due to expansion of local schools (e.g. Stanley School), need for affordable, accessible child-care is increasing. Scamps' location in Strathmore Road (across the road from Stanley School, a short walk from St. James's and from Fulwell station) makes it a perfectly situated child-care provider for working parents with children at those schools.	The Council and Achieving for Children strongly support Scamps in their wish to continue as a high-quality childcare provider and are working with Scamps to secure their future. This support is also reflected in the site allocation SA 7, which states that social and community infrastructure uses are the most appropriate land uses for this site.
57.	Katherine Jones, Savills obo Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted.
76.	James Togher, Environment Agency	Flood Zone 1; no comments	Noted.

Teddington Delivery Office

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
57.	Katherine Jones, Savills obo Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted.
76.	James Togher, Environment Agency	Flood Zone 1; contaminated land report required due to previous land uses	Noted.

Richmond College

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
25.	Andy Sutch, Sport Richmond	Support site specific developments at St Mary's College, Pools on the Park and the Richmond Athletic sites, the boat house restoration on Platts Eyot and development at Harlequins and the RFU. At Richmond College any loss of playing fields must only relate to provision of a large (double size) fit-for- purpose sports hall.	Support noted.
44.	Rebecca Pullinger, Campaign to Protect Rural England (CPRE)	Object to the inclusion of the playing fields in the redevelopment proposals for Richmond upon Thames College unless provisions ensure their enhancement for educational and community use.	<p>This proposal will provide a whole range of enhancement for education and community use, including a new replacement college, science / technology / engineering / maths centre, technical hub (B1), a new secondary school and special education needs school, sports centre as well as residential including affordable housing. In addition, the proposal requires the upgrading of the playing field to the south</p> <p>Note that an Outline planning application (15/3038/OUT) for this site is proposed to introduce a new 8-court sport hall (for which there is an identified need in the Council's Indoor Sport Facilities Needs Assessment); 4 x formal all weather MUGAs; 1 rugby compliant AGP pitch (which is recommended / highlighted as an opportunity in the Borough's Playing Pitch Strategy); and 1 grass pitch.</p> <p>Therefore, overall there is proposed to be a significant increase and enhancement in sport facilities across the site, including wider public benefits by making the sport facilities accessible to the public.</p>
68.	Robert Mackenzie, RPS obo Richmond-Upon-Thames College	The emerging allocation for the College does not accurately reflect the proposals which have been brought forward for the site. While a replacement college, science/technology/engineering/ maths centre, new special needs school, technical hub (B1) and new sports centre are all planned for site, the allocation has failed to include the new secondary school and residential units which are necessary for the site to come forward for development. The submitted outline proposal also includes the playing field to the south of the college. This should therefore form part of the site allocation. The application proposed that this playing field would be upgraded to include a new 3G playing pitch installed.	<p>The submitted comments have been used to inform the revised wording for this site, which is as follows:</p> <p>Redevelopment to provide a new replacement college, science / technology / engineering / maths centre, technical hub (B1), a new secondary school and special education needs school, sports centre as well as residential including affordable housing. Upgrading of the playing field to the south of the college, including the installation of a new 3G playing pitch.</p> <p>In addition, the boundary has been amended to ensure that the playing fields to the south are included in the site allocation.</p>

76.	James Togher, Environment Agency	Flood Zone 1; Duke of Northumberland's River nearby River Crane to the south <ul style="list-style-type: none"> • Flood Risk Assessment required • If this site designation is extended to the south to include the playing fields area it include Flood Zone 3 and the River Crane • 8 metre buffer zone and river/flood defence improvements required between development and the River Crane. Excellent potential for major river restoration/enhancements, with major improvements to the riverside environment. 	Noted.
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Mereway Day Centre

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
57.	Katherine Jones, Savills obo Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted.
76.	James Togher, Environment Agency	Flood Zone 2; site adjacent to the River Crane <ul style="list-style-type: none"> • Flood Risk Assessment required • 8 metre buffer zone and flood defence / river improvements required between development and the River Crane. • Excellent potential for major river restoration/enhancements, with major improvements to the riverside environment 	Noted.

Rugby Football Union

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
25.	Andy Sutch, Sport Richmond	Support site specific developments at St Mary's College, Pools on the Park and the Richmond Athletic sites, the boat house restoration on Platts Eyot and development at Harlequins and the RFU.	Support noted.
42.	Andrew Dorrian, Transport for London Planning	TfL will work closely with the applicant and council on the development of the stadium and any ancillary uses. The A316 study is applicable for any future development at the site, together with, servicing facilities and a visitor management plan.	Comments noted.

57.	Katherine Jones, Savills obo Thames Water	Thames Water has concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. In light of the capacity constraints, developers should provide a detailed drainage strategy, informing what infrastructure is required, where, when and how it will be delivered. Note that local network upgrades can take around 18 months to 3 years to design and deliver.	Comment noted. The draft Local Plan contains Policy LP 23 on Water Resources and Infrastructure. This states that new major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. This policy also requires applicants to provide evidence in the form of written confirmation from Thames Water as part of the planning application that capacity exists in the public sewerage and water supply network to serve their development.
62.	Marie-Claire Marsh, Nathaniel Lichfield & Partners obo Rugby Football Union	The site allocation for the RFU site should be as follows: <i>“The Council will support the sustainable growth of facilities and associated uses at Twickenham Stadium so that it can continue to provide a world class standard of facilities and visitor experience, appropriate to its status as a national stadium and the international home of rugby. This could include an enhanced stadium and new stadium facilities, sports facilities, ancillary uses and structures for matches and events, including concerts, and other new visitor facilities such as a hotel and conferencing facilities. Residential and/or office developments would also be acceptable. Proposals for new development and uses will be considered positively, provided that the proposed development or new uses would not have a detrimental environmental impact on the surrounding area, in particular residential amenity, and that there would not be an unacceptable impact on the local highway network. Proposals should protect the Duke of Northumberland River.”</i>	The submitted comments have been used to inform the proposal site wording for SA 11 Rugby Football Union of the draft Local Plan, which states that ‘The Council supports the continued use of the grounds as sports uses. Appropriate additional facilities include a new north stand, indoor leisure, hotel or business uses as well as hospitality and conference facilities, provided that they are complementary to the main use of the site as a sports ground.’ It also states in relation to MOL that any development proposal is required to protect, and where possible improve and enhance, the Duke of Northumberland River and the associated Metropolitan Open Land.

62.	Marie-Claire Marsh, Nathaniel Lichfield & Partners obo Rugby Football Union	<p>The MOL should be removed from the RFU site. It extends across the training grounds, the river corridor and onto the RFU site to the east. Uses within the MOL on the RFU site have comprised extensive car park areas, storage, temporary marquees, plant and circulation space. RFU do not agree with the Council's position of not reviewing the MOL boundaries; this is contrary to London Plan Policy 7.17 states that "any alterations to the boundary of MOL should be undertaken by Boroughs through the LDF process, in consultation with the Mayor and adjoining authorities". The MOL on the RFU site is unnecessary and contrary to the spirit of national and strategic policy that seeks to support such facilities. It is clear that the area of land designated as MOL is not open green space; it is developed land that has been used for ancillary uses by the RFU for in excess of 30 years; it is not clearly distinguishable from the built up area, indeed it is part of the built up area; it does not include open air facilities for leisure as it currently comprises car parking, plant and storage facilities; it contains no features or landscapes and it does not form part of a green link.</p> <p>As such, this area of land clearly does not meet any of the above criteria set out at Policy 7.17 of the London Plan, and therefore there is no justification for this area to maintain MOL status. LB Hammersmith and Fulham reviewed their MOL boundaries, and for the Linford Christie Stadium, the Council removed the MOL as it will make it easier for the development of improved sports facilities on the site should proposals come forward. It is also noted that the Council is willing to amend the MOL boundary at Harrodian School.</p>	<p>National guidance on Green Belt states that Green Belt boundaries [and MOL] should only be altered in exceptional circumstances. The draft Local Plan's Spatial Strategy states that the borough's parks and open spaces provide the green lung for south/west London. In addition, it demonstrates that the Borough can meet its housing needs without releasing open land that is protected by designations such as Green Belt or MOL. Therefore, a borough-wide Green Belt or MOL review is not undertaken as part of this Local Plan.</p> <p>In relation to the MOL on this site, it should be noted that this site is adjacent to the Duke of Northumberland River, which is designated MOL. Other policies in existing plans as well as in the draft Local Plan set out the requirement for buffer zones alongside rivers as well as providing corridors for movement as part of the wider green infrastructure network. This site forms part of a larger swathe of MOL, providing a connection and buffer to the Duke of Northumberland River, which connects further to the River Crane to the south as well as the open land and playing fields at Chase Bridge to the west, which link further with the grounds of Kneller Hall.</p> <p>Therefore, by virtue of the MOLs location adjacent and alongside the Duke of Northumberland River, it clearly contributes to the physical structure of London by being distinguishable from the built up area when taken as a whole. The MOL designation of this site contributes to the wider area, which taken as a whole provide a distinct break from the more prevalent urban fabric and in particular the main Stadium to the east. Therefore, this designation fulfils criterion a of the London Plan policy as this site is 'clearly distinguishable'. Whilst the site as a whole provides a significant national facility for sport, it is acknowledged that the MOL in itself does not provide this function (i.e. criterion b of the MOL policy). The site provides an important link and buffer area to the Duke of Northumberland River. By virtue of being situated adjacent to the river, it is considered to be of importance to the local as well as wider green infrastructure network and biodiversity (i.e. criteria a and d of the MOL policy).</p> <p>Should any proposals for the site come forward, this will be assessed in line with MOL policies. Also see Site A</p>
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76.	James Togher, Environment Agency	Flood Zone 2; adjacent to Duke of Northumberland's River and Whitton Brook; Any redevelopment needs to incorporate 8 metre buffer zone and flood defence/ river improvement	Noted.
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St Mary's University College

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
25.	Andy Sutch, Sport Richmond	Support site specific developments at St Mary's College, Pools on the Park and the Richmond Athletic sites, the boat house restoration on Platts Eyot and development at Harlequins and the RFU. At Richmond College any loss of playing fields must only relate to provision of a large (double size) fit-for- purpose sports hall.	Noted.
44.	Rebecca Pullinger, Campaign to Protect Rural England (CPRE)	Any proposals for St Mary's University College will need to ensure that they include provisions to ensure that there are no negative impacts on the protected Historic Park and Garden and Metropolitan Open Land.	Noted. The site allocation acknowledges that this is a very constrained site, with the majority of land not built on designated as Metropolitan Open Land. There are also Listed Buildings, Buildings of Townscape Merit as well as sports playing fields. Also note that other Local Plan policies, including on Designated Heritage Assets as well as Green Belt and Metropolitan Land would be applied to any development proposal coming forward on this site.

58.	Katie Brown, Nathaniel Lichfield & Partners obo St Mary's University	<p>Full University status achieved in 2014; introduction of £9,000 per year tuition fees; expectation of students to increase; SMU needs to ensure it continues to deliver the quality of facility expected. Current population of around 6,000 (4,700 FTE), which is expected to increase closer to 12,000 (9.283 FTE) by 2025. This places pressure on both learning and living facilities. Much of the existing facilities on site are in need of modernisation and upgrade; teaching and learning spaces would benefit from improvements, redevelopment and rebuild; need for a Learning Resource Centre; need for additional lecture theatres and teaching rooms that are able to support larger classes. There is also a need for affordable residential accommodation for students. Currently only 700 live on campus and there is an identified need for 1,645 beds. This is expected to increase to 3,249 beds in 2025.</p> <p>SMU is aware of the site constraints at its main campus on Waldegrave Road, including MOL, Historic Park and Garden (Grade II*), Waldegrave Park Conservation Area, listed buildings (including the Grade I listed Strawberry Hill House).</p> <p>SMU is working on a Masterplan for the campuses to ensure the future need is accommodated in an appropriate way; it is envisaged that once agreed, the Masterplan may then come forward as a SPD. SMU supports the proposed allocation of its main campus on Waldegrave Road, establishing the principle of development on this constrained site.</p> <p>Council is invited to review previous SMU submissions and the need to ensure flexibility in the development being delivered. Also comments in relation to DM OS 2 and DM OS 9.</p>	<p>The Council will support and work with St Mary's University to ensure it remains a highly regarded, competitive and viable higher education facility in the future and to assist in meeting future educational needs of students. The submitted comments have been used to inform the site allocation SA 8 for St Mary's.</p> <p>The proposal is for 'Retention and upgrading of St Mary's University and its associated teaching, sport and student residential accommodation. Upgrade works to include refurbishment, adaptation, extensions and new build elements on site where appropriate.</p> <p>A Masterplan and/or site development brief, together with new estates and student accommodation strategies, will be prepared in conjunction with the Council. This will guide future development for St Mary's University, both on and off site.'</p> <p>The supporting text takes account of the growing demand for university places and the need to improve and upgrade the existing facilities as well as a need to provide additional educational floorspace, student residential accommodation and other associated facilities.</p> <p>It is acknowledged that this is a very constrained site, with the majority of land not built on designated as Metropolitan Open Land. There are also Listed Buildings, Buildings of Townscape Merit as well as sports playing fields.</p> <p>Any redevelopment proposal has to respect the special and unique location and setting of St Mary's University, including the adjoining Grade 1 Listed Building (Strawberry Hill House) and the associated Historic Park and Garden. The Council will work with the University on a Masterplan for the longer term upgrading of their sites to meet the demand for additional teaching, sport and student residential accommodation, taking account of existing site constraints.</p>
76.	James Togher, Environment Agency	<p>Currently most of the site is Flood Zone 1 (Eastern side of the site borders a high risk Flood Zone 3); site is 170 metres from tidal flood defences; due to proximity to high risk flood zone proposed redevelopment needs to take account of climate change and be informed by latest flood map updates</p>	Noted.

Harlequins Rugby

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
25.	Andy Sutch, Sport Richmond	Support site specific developments at St Mary's College, Pools on the Park and the Richmond Athletic sites, the boat house restoration on Platts Eyot and development at Harlequins and the RFU.	Support noted.
42.	Andrew Dorrian, Transport for London Planning	TfL recognises that changes may be required to the A316 Chertsey Road (TLRN). Any changes to or additional signalised junctions onto the A316 must be fully justified having regard to operation of the wider network so as to ensure general conformity with London plan policy 6.11. The A316 study as referenced above would be applicable to this project.	Comments noted. The proposal site for Harlequins SA 10 states that 'The Council will work closely with partners, including Transport for London and Harlequins, to ensure the development does not lead to harmful impacts on the local road network.'
66.	Joanna Debs, Harlequin Football Club Ltd	<ul style="list-style-type: none"> • Need to retain and enhance continued use as a sporting arena with associated facilities. • Potential need for associated new facilities including a new north stand, indoor leisure (gym/training facilities), business uses, café zone, museum or potentially a hotel. • Need to enhance facility to enable focus and best practice in environmental, social and economic sustainability. • Additional uses need to be complimentary to the main use of the site as a sports ground. • Need to protect and enhance the Duke of Northumberland River. • Need to retain sufficient parking, particularly for servicing facilities and space for spectators, disabled spectators, cycle parking facilities and related services. • Need to retain pedestrian access to and from local transport links, via Craneford Way. 	The submitted comments have been used to inform the site allocation SA 10 Harlequins, which states that the Council supports the continued use of the grounds as sports uses. Appropriate additional facilities include a new north stand, indoor leisure, hotel or business uses, provided that they are complementary to the main use of the site as a sports ground.
76.	James Togher, Environment Agency	Flood Zone 1; adjacent to Duke of Northumberland's River; any redevelopment needs to incorporate 8 metre buffer zone and flood defence/ river improvements required	Noted.

Twickenham Central Depot

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
25.	Andy Sutch, Sport Richmond	Sport Richmond would support an investigation of possible sport and leisure use of the Central Depot site.	Noted. This site is no longer proposed to be allocated as part of the Local Plan.

76.	James Togher, Environment Agency	Flood Zone 1; Duke of Northumberland's River on western boundary of the site; River Crane to south east corner of the site <ul style="list-style-type: none"> Any redevelopment needs to incorporate 8 metre buffer zone and flood defence/ river improvements required between development and Duke of Northumberland's river. Excellent potential for major river restoration/enhancements, with major improvements to the riverside environment. Contaminated land report required due to previous land uses 	Noted. This site is no longer proposed to be allocated as part of the Local Plan.
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Telephone Exchange, Whitton

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
56.	Cllr Liz Jaeger	Suggestion that this site should be earmarked for office/employment in light of recent loss of office/employment space.	Noted. See the proposed site allocation SA 13, which states that appropriate land uses include employment and social infrastructure or other appropriate town centre uses.

Ryde House

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
76.	James Togher, Environment Agency	Flood Zone 3; protected by Thames (Tidal) Flood defences; Flood Risk Assessment will be required	Noted.

Ham Central Area

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
24.	Jan Gare, Ham Library Friends Group	The Ham Library site is quite rightly not included within your proposed site allocation area, although it is anomalously included within the Ham Close Regeneration area to which you refer as being subject to a more detailed consultation exercise. That consultation exercise delivered the overwhelming view from the Friends of Ham Library that the library should be retained on its existing site and should not be relocated into the community centre proposed for the Ham Central Area.	The Council supports the regeneration of Ham Close and will work in cooperation with Richmond Housing Partnership in order to rejuvenate Ham Close and its surrounding area – see site allocation SA 14 of the draft Local Plan, which also includes a map of the boundary, which confirms that Ham Library is not included within this site.
57.	Katherine Jones, Savills obo Thames Water	Thames Water has concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. In light of the capacity constraints, developers should provide a detailed drainage strategy, informing what infrastructure is required,	Comment noted. The draft Local Plan contains Policy LP 23 on Water Resources and Infrastructure. This states that new major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. This policy also requires applicants to provide evidence in the form of written confirmation from Thames Water as part of the planning

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		where, when and how it will be delivered. Note that local network upgrades can take around 18 months to 3 years to design and deliver.	application that capacity exists in the public sewerage and water supply network to serve their development.
75.	NHS England , NHS Property Services, Healthy Urban Development Unit (HUDU) and Richmond CCG	We are keen to ensure early and full involvement of health organisations, including Hounslow and Richmond Community Healthcare Trust in planning around these developments. Any potential population increases will impact on the capacity of health services and future planning arrangements. In particular, there is the need for coordinated approach to development and healthcare requirements in Ham.	Comments noted. The Council works in cooperation with Richmond Housing Partnership, and early engagement with the relevant health bodies is being pursued outside of the Local Plan making process.
76.	James Togher, Environment Agency	Flood Zone 1; Flood Risk Assessment required	Noted.

Cassel Hospital and grounds

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
28.	Margaret Simpson	Broadly in support; would welcome information as to when these suggestions will be particularised; some immediate concerns: <ul style="list-style-type: none"> • traffic management on Ham Street: narrow road, lots of vehicles, cyclists, pedestrians, vehicles including coaches parked on Ham Common (also long-term); impacts on pollution, noise and environment generally • a possibility of a road through the Cassel site is identified in the Petersham Neighbourhood Plan, i.e. to link Craig Road and Ham Common, but this would become a run-through for traffic and would exacerbate the situation • arrangements for access to and egress from Cassel site will have to be considered carefully • trees, including particularly those adjacent to Langham House Close; risk that developers could cut down trees in order to extend accommodation and service blocks, or provide car parking. The Council should be extremely vigilant about all trees on the Cassel site. 	Noted. The majority of the matters referred to in the submitted comments are not matters for the Local Plan, such as traffic management measures. In addition, it should be noted that all Local Plan policies will be applied to any emerging proposal on this site, including transport policies as well as policies on amenity and living conditions, pollution and trees.
53.	Tor Barrett, Nathaniel Lichfield & Partners on behalf of West London Mental Health NHS Trust	Cassel Hospital is the Trust's only site in LBRuT. Cassel Specialist Personality Disorder Service (CSPD) is a national service and occupies less than half the premises at Cassel Hospital. The remainder of the buildings are vacant and have been since 2011. Trust can no longer sustain the financial cost of maintaining this largely empty, listed property and extensive grounds in the long term.	The submitted comments have informed the amendments made to this proposal site, which is now as follows: 'If the site is declared surplus to requirements, social and community infrastructure uses are the most appropriate land uses for this site. Conversion or potential redevelopment for residential uses could be considered if it

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		Options for the location of the CSPD service are being considered, including disposing of the site either in part or in full. Asset has been placed on the Register of Surplus Public Sector Land and redundant parts of have marketed. Comments on proposed land uses: <ul style="list-style-type: none"> • educational use: not justified; lack of evidence to demonstrate demand; not mentioned in the School Place Planning Strategy; poor PTAL; not suitable location and building • need for flexibility and compatibility of uses: deliverable/viable plans; Trust continues to explore options; educational use would not be feasible if CSPD services are retained on site • need to secure long term future of heritage asset; proposed uses should be realistic, achievable and viable • conversion of the listed building to residential dwelling(s), possibly with some small/medium scale residential use in the grounds, would be an appropriate alternative use and would help to secure a long term and viable future for the building and grounds • residential uses are likely to be the only viable alternative • support for “residential (and affordable housing units) and/or community uses”; but “and education...” is not supported 	enables the protection and restoration of the Listed Buildings.’
57.	Katherine Jones, Savills obo Thames Water	Thames Water has concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. In light of the capacity constraints, developers should provide a detailed drainage strategy, informing what infrastructure is required, where, when and how it will be delivered. Note that local network upgrades can take around 18 months to 3 years to design and deliver.	Comment noted. The draft Local Plan contains Policy LP 23 on Water Resources and Infrastructure. This states that new major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. This policy also requires applicants to provide evidence in the form of written confirmation from Thames Water as part of the planning application that capacity exists in the public sewerage and water supply network to serve their development.
76.	James Togher, Environment Agency	Flood Zone 1; contaminated land report required due to previous land uses	Noted.

St Michael's Convent

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
1.	Caroline Britton	Concerned that St Michael's Convent has been identified as area for development, especially affordable housing. Given high land values	Support noted.

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		near Ham Common, only high density schemes would make affordable housing viable, which would be at odds with the character of the area and have serious traffic implications.	
7.	Georg Hoefler	Support proposal, particularly designating the gardens as OOLTI. Consider provision of managed public access to unique gardens for several days every year and designation of the grounds as Local Green Space.	Support noted.
11.	Juliet Nolan	Support designating the gardens as OOLTI.	Support noted.
14.	Peter Britton	Support designating the gardens as OOLTI.	Support noted.
15.	Fiona McDaniel	Support designating the gardens as OOLTI (Open Garden days should be retained; habitat for rich diversity of wildlife; rotting/decayed trees are homes for the endangered stag beetle; presence of night owls and badgers)	Support noted.
16.	Bryony Lodge	Support designating the gardens as OOLTI.	Support noted.
17.	Karen Skipper	Support designating the gardens as OOLTI.	Support noted.
20.	Ham & Petersham Association	Support designating the gardens as OOLTI.	Support noted.
27.	Andrew Barnard	Support designating the gardens as OOLTI. Existence of a listed building means that any future redevelopment will need careful consideration.	Support noted.
33.	Jane Morrisson	Support designating the gardens as OOLTI as it meets 4 of the criteria set out in the Council's OOLTI policy. In addition, there is a historical interest. Use of the site generally and development of the buildings should be in keeping with the local character of the immediate area and kept to a minimum to ensure the gardens and boundaries are protected.	Support noted.
46. and 47.	Kathleen and Paul Massey	Support designating the gardens as OOLTI; convent lies in the Great South Avenue of Ham House, a 'green corridor' connecting Richmond Park and Ham Common; importance for biodiversity and need to retain Open Garden days.	Support noted.
48.	Lizabeth Rohovit	Support designating the gardens as OOLTI.	Support noted.
49.	Neill Tughan	Support designating the gardens as OOLTI.	Support noted.
52.	Dale Nolan	Support designating the gardens as OOLTI on the basis of the site being of value for biodiversity and nature conservation; the gardens are part of the wildlife corridor between the River Thames and Richmond Park, along with Ham Avenues and Ham Common. Also of importance for immediate or longer views into and out of the site, including from surrounding properties. Gardens also make a contribution to the local character by virtue of its size, position and	Support noted.

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		quality.	
57.	Katherine Jones, Savills obo Thames Water	Due to the complexities of wastewater networks, Thames Water is unable to make a detailed assessment of the impact the proposed housing provision may have on the wastewater infrastructure.	Comment noted. The draft Local Plan contains Policy LP 23 on Water Resources and Infrastructure. This states that new major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. This policy also requires applicants to provide evidence in the form of written confirmation from Thames Water as part of the planning application that capacity exists in the public sewerage and water supply network to serve their development.
76.	James Togher, Environment Agency	Flood Zone 1 (lowest risk); no rivers or flood defences on site or adjacent; contaminated land report required due to previous land uses	

Pools on the Park

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
25.	Andy Sutch, Sport Richmond	Support site specific developments at St Mary's College, Pools on the Park and the Richmond Athletic sites, the boat house restoration on Platts Eyot and development at Harlequins and the RFU.	Support noted.
76.	James Togher, Environment Agency	Flood Zone 1; contaminated land report required due to previous land uses	Noted.

Richmond Station

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
42.	Andrew Dorrian, Transport for London Planning	TfL welcomes the desire to improve the station and requests consultation on the detailed proposals due to the incidence of both London Overground and London Underground services operating from this station.	Support noted.
57.	Katherine Jones, Savills obo Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted.
76.	James Togher, Environment Agency	Flood Zone 1; no comments	Noted.

Richmond Rugby Ground

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
25.	Andy Sutch, Sport Richmond	Support site specific developments at St Mary's College, Pools on the Park and the Richmond Athletic sites, the boat house restoration on Platts Eyot and development at Harlequins and the RFU.	Support noted.
76.	James Togher, Environment Agency	Flood Zone 1; any redevelopment should consider impacts upon the site's neighbouring SNCI, Royal Mid Surrey Golf Course which is designated for its wetland habitats (and acid grassland)	Noted.

Friars Lane Car Park

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
57.	Katherine Jones, Savills obo Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted.
76.	James Togher, Environment Agency	Flood Zone 3; Thames (Tidal) – about 45 metres away; Sequential Test and Flood Risk Assessment required	Comments noted. A flood risk sequential test has been prepared to support the site allocations. It should be noted that all Local Plan policies will be applied to any emerging proposal on this site, such as those on flood risk and river corridors.

Stag Brewery

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
39.	Max Millington	<p>The proposed development, if insensitively pursued, could blight the lives of the residents of Trinity Mews Development and negatively impact real estate values both during the construction phase and years to come, in line with 'Amenity' as outlined in section 5.12 of the 2011 site brief.</p> <p>The School Place Planning Strategy was amended to provide for a six-form entry secondary school, which risks the deliverability of the original 2011 site brief; concerns regarding the legality of this decision and the process by which it was reached.</p> <p>The Council should proceed on the basis of dual plans: one for a primary school, which has the demonstrable support of the local community, and one for a secondary school.</p> <p>Objectives and visions of the 2011 site brief should be endorsed; the indicative plan from the brief remains mostly appropriate – previous option considered in the Consultation Solicitation Document would have been preferred.</p>	<p>In relation to the need for a secondary school, at its meeting in October 2015, the Council's Cabinet adopted a revised version of its School Place Planning Strategy to take account of the growing forecast need for additional secondary school places in the east of the borough. Specifically, the Strategy identifies a clear and demonstrable need for a new secondary school, the only suitable location for which is the Stag Brewery site. See the draft Local Plan's site allocations proposal SA 23 for further information.</p> <p>In relation to the other submitted comments, it should be noted that all Local Plan policies will be applied to any emerging proposal on this site, such as transport policies as well as policies on building heights, play space, public open space, sport and recreation, amenity and living conditions, pollution and trees.</p>

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		<p>If the site incorporates a secondary school, and not 'community use', it is important that the community hub be relocated to engender a village feel consistent with overall objectives. This may require a smaller residential allocation.</p> <p>The retention of the playing fields remains of significant importance. Any new development adjacent to the Trinity Mews Development should be sympathetic to the housing style found there and throughout Richmond Borough.</p> <p>Mortlake is an area where taller buildings will be inappropriate in general. Any new development should be fundamentally low-rise, with the exception of certain existing buildings which may (in-keeping with their present appearance), in places, rise to 6-8 stories; the perimeters – including outside the Trinity Mews Development and the river frontage – should be especially low-rise (maximum 2-3 stories) and must afford existing residences their right to light; and the proposed development must not at any point exceed the height of buildings already on that footprint.</p> <p>No more than 390 dwellings should be supported on the site, with low density housing (40-50 dph) to the north of the playing field.</p> <p>No more than 40% should be allocated to affordable housing, and of that, most should be made available to key workers; all homes should achieve Code Level 4.</p> <p>Transport provision must be adequately addressed at planning stage, including:</p> <ul style="list-style-type: none"> • relocation of the Mortlake bus terminus to the site, or potentially to the under-utilised land next to Chalkers Corner on the Lower Richmond Road; • Increase the provision of rush-hour services to Mortlake Railway Station, which is already substantially over-utilised and merits additional, and fast/semi-fast, services to London Waterloo, with additional 10-car carriages; there is presently zero capacity on rush-hour trains and significant investment is required to accommodate the additional users/occupiers. • Extend riverboat services to the City, or at least Putney to connect with services there, to alleviate pressure on the railway network • allow for ample roadways and paths, including access across the site to the River Thames and to Mortlake Station (including any new bus terminal) • assess the increased volume of traffic, in what is already, along 	

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		<p>the Lower Richmond Road in particular, an over-used stretch of road;</p> <ul style="list-style-type: none"> a controlled parking scheme on Williams Lane and environs benefitting residents of the Trinity Mews Development 	
51.	Tim Catchpole, Mortlake with East Sheen Society	<p>We note the need for a 6-form secondary school (see above) and the opportunity for the relocation here of the Avondale bus turn-around. Is there a need for such a school when the Richmond upon Thames College free school opens in 2017?</p> <p>We note the need for the Council to respond to the new London Plan housing target (315 units) and we realise there is a major opportunity to provide housing on this site. The number of units, however, will need to be regulated in terms of the size, massing and height of the development and the traffic capacity of the Lower Richmond Road.</p>	<p>Whilst the Richmond upon Thames School is indeed due to open in September 2017, it is intended to serve children and young people living in the west of the borough. The Council's School Place Planning Strategy is predicated not just on providing an overall sufficiency of places, but of diversity of provision and of enabling children and young people to be educated within their immediate community. The provision of a new secondary school as part of the redevelopment of the stag Brewery site would meet all of those three aims.</p>
57.	Katherine Jones, Savills obo Thames Water	<p>Thames Water has concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development.</p> <p>In light of the capacity constraints, developers should provide a detailed drainage strategy, informing what infrastructure is required, where, when and how it will be delivered. Note that local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<p>Comment noted. The draft Local Plan contains Policy LP 23 on Water Resources and Infrastructure. This states that new major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. This policy also requires applicants to provide evidence in the form of written confirmation from Thames Water as part of the planning application that capacity exists in the public sewerage and water supply network to serve their development.</p>
75.	NHS England , NHS Property Services, Healthy Urban Development Unit (HUDU) and Richmond CCG	<p>We are keen to ensure early and full involvement of health organisations, including Hounslow and Richmond Community Healthcare Trust in planning around these developments. Any potential population increases will impact on the capacity of health services and future planning arrangements.</p>	<p>Note that proposal site SA 23 Stag Brewery of the draft Local Plan specifically refers to 'health facilities' as part of the appropriate uses for this site. In addition, it should be noted that all Local Plan policies will be applied to any emerging proposal on this site, such as those in relation to health and wellbeing and community and social infrastructure facilities.</p>
76.	James Togher, Environment Agency	<p>Flood Zone 3; adjacent to River Thames (Tidal) and flood defences</p> <ul style="list-style-type: none"> Sequential test/exception test required Opportunity for improving a brownfield riverside site and the environment, tidal flood defences and Thames Path in line with TE2100 plan actions and improve linkages to Mortlake and Barnes Development should consider options to incorporate tidal 	<p>Comments noted. A flood risk sequential test has been prepared to support the site allocations. It should be noted that all Local Plan policies will be applied to any emerging proposal on this site, such as those on flood risk and river corridors.</p>

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		<p>terracing and set back flood defences in line with the Estuary Edges guidance to increase the amount of natural river bank, currently only 2% of the tidal banks are natural across the estuary.</p> <ul style="list-style-type: none"> • A Flood Risk Assessment and Water Framework Directive Assessment required • Contaminated land report required due to previous land uses 	

Telephone Exchange, East Sheen

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
51.	Tim Catchpole, Mortlake with East Sheen Society	No comments	Noted.
57.	Katherine Jones, Savills obo Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted.
76.	James Togher, Environment Agency	Flood Zone 1; contaminated land report required due to previous land uses	Noted.

Mortlake and Barnes Delivery Office

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
51.	Tim Catchpole, Mortlake with East Sheen Society	No comments	Noted.
57.	Katherine Jones, Savills obo Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted.
76.	James Togher, Environment Agency	<p>Flood Zone 3; 90 metres from River Thames (Tidal) and flood defences;</p> <ul style="list-style-type: none"> • Sequential test required • Flood Risk Assessment required and development should be informed by the TE2100 plan 	<p>Comments noted. A flood risk sequential test has been prepared to support the site allocations. It should be noted that all Local Plan policies will be applied to any emerging proposal on this site, such as those on flood risk and river corridors.</p>

Kew Biothane Plant

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
44.	Rebecca Pullinger,	Support for any proposals at the Kew Biothane Plant site that	Support noted.

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
	Campaign to Protect Rural England (CPRE)	incorporate the provision of high quality public open space and the improvement of the character and openness of the part of the site which is designated as MOL. The Local Plan should state explicitly that the current extent of the protected open space must be maintained through any proposed planning applications.	Note that draft Local Plan proposal site SA 26 states that 'Parts of the site are designated as Metropolitan Open Land and development in this area would not be acceptable. There is an expectation that any redevelopment proposal improves the character and openness of the Metropolitan Open Land.'
57.	Katherine Jones, Savills obo Thames Water	The Kew Biothane plant is currently a Thames Water site. There are wastewater network capacity constraints in the area. Thames Water will be working with the developer to ensure that the foul flows from the development can be accommodated. Given the network capacity constraints we would recommend that the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what drainage infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure.	Comment noted. The draft Local Plan contains Policy LP 23 on Water Resources and Infrastructure. This states that new major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. This policy also requires applicants to provide evidence in the form of written confirmation from Thames Water as part of the planning application that capacity exists in the public sewerage and water supply network to serve their development.
76.	James Togher, Environment Agency	Flood Zone 3; behind River Thames (Tidal) Flood Defences (Borders) <ul style="list-style-type: none"> • Site should follow sequential test if residential land uses proposed to demonstrate no lower risk sites are available • Flood Risk Assessment required and development should be informed by the TE2100 plan • Contaminated land report required due to previous land uses • Site offers opportunities for improving the riverside environment) 	Comments noted. A flood risk sequential test has been prepared to support the site allocations. It should be noted that all Local Plan policies will be applied to any emerging proposal on this site, such as those on flood risk and river corridors.

Barnes Hospital

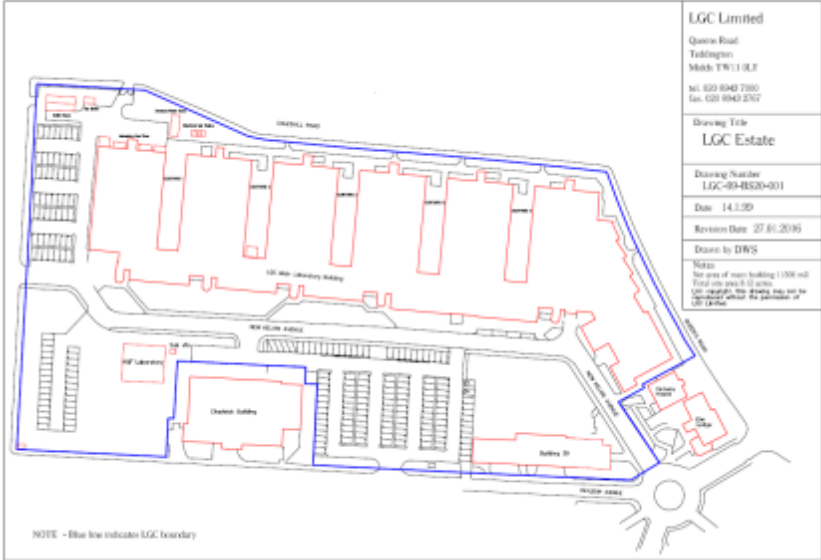
Ref. no.	Name / Organisation	Summary of comments	Officers' comments
51.	Tim Catchpole, Mortlake with East Sheen Society	Concerns about increased demand for primary school places; we are aware of the Council's proposal to expand East Sheen Primary from an intake of 60/year to 90/year. We also note that part of Barnes Hospital is identified for a new primary school, but is this really necessary if East Sheen Primary is to be expanded? We do not consider the Barnes Hospital site to be suitable for a primary school due to its poor access and would argue that surplus land on the site	In November 2015, the Council's Cabinet, acting as 'local decision maker', approved the statutory proposal to expand East Sheen Primary to three-form entry from September 2016 onwards. However, more places are still required and the Council retains the aspiration of seeing a two-form entry primary school open as part of a proposed redevelopment of the Barnes Hospital site – see draft Local Plan proposal

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		should be used for housing, including special needs housing.	site SA 27 Barnes Hospital.
57.	Katherine Jones, Savills obo Thames Water	Thames Water has concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. In light of the capacity constraints, developers should provide a detailed drainage strategy, informing what infrastructure is required, where, when and how it will be delivered. Note that local network upgrades can take around 18 months to 3 years to design and deliver.	Comment noted. The draft Local Plan contains Policy LP 23 on Water Resources and Infrastructure. This states that new major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. This policy also requires applicants to provide evidence in the form of written confirmation from Thames Water as part of the planning application that capacity exists in the public sewerage and water supply network to serve their development.
76.	James Togher, Environment Agency	Flood Zone 1; Contaminated land report required due to previous land uses	Noted.

PROTECTION OF KEY OFFICE AREAS AND EMPLOYMENT SITES

National Physical Laboratory, Teddington

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
23.	Jonathan Stobart, CBRE on behalf of The Laboratory of the Government Chemist	The site is incorrectly identified within the consultation draft plan under the demise of the National Physical Laboratory, Hampton Road, Teddington; it should be the Laboratory of the Government Chemist (LGC). No support for proposed protection of key employment land. The site is increasingly becoming unfit for purpose due to significant changes in LGC's business model, changes in customer requirements, the evolution of scientific techniques and high operating costs / inefficiencies. The site remains an important facility to LGC with its large local workforce and intention is to retain the site as its group headquarters and part of its UK laboratory operations. However, a proportion of the site is surplus to requirements and a new mixed-use site allocation should be identified in the emerging plan – see map below. Part of the site can be brought forward with a mix of employment and residential uses, with the remainder being used for developing a new purpose built facility on-site.	Comments noted. Amendments have been made to the description of the site, which is now referred to as 'National Physical Laboratory and Laboratory of the Government Chemist, Hampton Road, Teddington' The borough has a very limited supply of industrial floorspace and demand for this type of land is high in the borough. The GLA's Land for Industry and Transport SPG (2012) states that Richmond should ensure a 'restrictive' approach towards the transfer of industrial land to other uses until 2031. Further to this, the GLA has recently published an Industrial Land Supply and Economy Study (2015) which demonstrates that Richmond borough has a very limited supply of industrial land with only 17.3 hectares of general and light industrial space and 8.1 hectares of warehousing and storage facilities, amongst the lowest of all the London boroughs. The borough's 'restrictive transfer'

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		<p>We are keen to meet with the local authority in order to work through the potential options and set the parameters for housing numbers and employment floorspace.</p> 	<p>approach is highly likely to be retained within a new London Plan.</p> <p>In addition, the Council has carried out extensive research and assessed and analysed the borough's existing industrial land and business parks. It demonstrates that there are only 22 sites across the borough that merit special protection as locally important industrial estate or business park, of which the NPL and LGC is a key site. Therefore, draft Local Plan policy LP 42 Industrial Land and Business Parks identifies and lists all those locally important industrial estate or business park and gives them enhanced protection.</p>

St Clair Business Park, Hampton

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
18.	Mr Murray Smith, Dunphys Chartered Surveyors obo St. Clair Business Centre	<p>Access via a narrow residential side road; several buildings are vacant and have become obsolete, beyond physical or economic rehabilitation.</p> <p>A planning application submitted last year (mixed use with predominantly residential) was sympathetically received by Council's Planning Department – this was subsequently withdrawn to allow for design amendments.</p> <p>In view of the age of the buildings and the site's location, residential development should be favoured in the site's reallocation for future land uses.</p>	<p>The borough has a very limited supply of industrial floorspace and demand for this type of land is high in the borough. The GLA's Land for Industry and Transport SPG (2012) states that Richmond should ensure a 'restrictive' approach towards the transfer of industrial land to other uses until 2031. Further to this, the GLA has recently published an Industrial Land Supply and Economy Study (2015) which demonstrates that Richmond borough has a very limited supply of industrial land with only 17.3 hectares of general and light industrial space and 8.1 hectares of warehousing and storage facilities, amongst the lowest of all the London boroughs. The borough's 'restrictive transfer' approach is highly likely to be retained within a new London Plan.</p>

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
			<p>In addition, the Council has carried out extensive research and assessed and analysed the borough's existing industrial land and business parks. It demonstrates that there are only 22 sites across the borough that merit special protection as locally important industrial estate or business park, of which St Clair Business Park is a key site. Therefore, draft Local Plan policy LP 42 Industrial Land and Business Parks identifies and lists all those locally important industrial estate or business park and gives them enhanced protection.</p> <p>Site specific evidence submitted in support of pre-applications or at application stage will be considered as part of the DM process.</p>
19.	James Lloyd, James Lloyd, Associates Limited obo Tyton Properties Limited	<p>Reference to Outline Planning Application (15/0621/OUT), where applicants concluded that there is satisfactory evidence of marketing and a sequential approach was applied, demonstrating that:</p> <ul style="list-style-type: none"> neither a 'pure' employment scheme nor a mixed use scheme which retains the same amount of employment floorspace as at present would be viable; a residential-led scheme which includes a significant proportion of affordable homes, employment uses and employment-generating uses, would be viable The site is largely unsuitable for modern day industrial / warehouse use and for large-scale office development – poor PTAL, restricted access / servicing arrangements <p>Site could meet other needs, such as affordable housing and commercial floorspace, including delivery of public open space. Current identification of the site as an important business park is too rigid and introduces a risk to the deliverability of the allocation through potential lack of support from a willing freeholder and / or willing developer. Viability testing will be required. More flexibility needs to be added and the following site allocation is suggested: <i>"A Comprehensive mixed-use development to provide a strategic housing development and other compatible uses relative to accessible open space. The provision of infrastructure within the site will be subject to testing through an individual viability assessment as the planning application stage."</i></p> <p>The following design principles should be adopted:</p> <ul style="list-style-type: none"> Development should respect and be informed by the existing character, scale, height, massing and urban grain of the 	<p>The borough has a very limited supply of industrial floorspace and demand for this type of land is high in the borough. The GLA's Land for Industry and Transport SPG (2012) states that Richmond should ensure a 'restrictive' approach towards the transfer of industrial land to other uses until 2031. Further to this, the GLA has recently published an Industrial Land Supply and Economy Study (2015) which demonstrates that Richmond borough has a very limited supply of industrial land with only 17.3 hectares of general and light industrial space and 8.1 hectares of warehousing and storage facilities, amongst the lowest of all the London boroughs. The borough's 'restrictive transfer' approach is highly likely to be retained within a new London Plan.</p> <p>In addition, the Council has carried out extensive research and assessed and analysed the borough's existing industrial land and business parks. It demonstrates that there are only 22 sites across the borough that merit special protection as locally important industrial estate or business park, of which St Clair Business Park is a key site. Therefore, draft Local Plan policy LP 42 Industrial Land and Business Parks identifies and lists all those locally important industrial estate or business park and gives them enhanced protection.</p> <p>Site specific evidence submitted in support of pre-applications or at application stage will be considered as part of the DM process.</p>


Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		<p>surrounding built environment and its 'local' centre location</p> <ul style="list-style-type: none"> • Development should be stepped back from the railway line where appropriate • Walking and cycling connections should be improved to, from and created within the site. These routes should align with the existing urban grain where appropriate to support permeability and legibility 	
76.	James Togher, Environment Agency	Flood Zone 1; no comments	Noted.

Sandycombe Centre, Sandycombe Road, Kew


Ref. no.	Name / Organisation	Summary of comments	Officers' comments
67.	Alex Arrol, Goldcrest Land	<p>Object to the identification of Sandycombe Centre, Sandycombe Road, Kew as key employment land. The site is currently not designated/allocated in the Local Plan, although it is identified as a Key Employment Site in the emerging Site Allocations Plan.</p> <p>The site is vacant, has been marketed for employment use since April 2015 and it is clear that there is no prospect of securing any viable employment use on the site in its current state. An entirely employment based redevelopment of the site will not be viable due to the site's constraints. Evidence has been submitted as to why this site is particularly suitable for residential development.</p> <p>Proposed wording for site allocation: "Residential led development. Subject to there being demand, office provision as part of a residential led mixed use scheme will be supported".</p>	<p>The borough has a very limited supply of industrial floorspace and demand for this type of land is high in the borough. The GLA's Land for Industry and Transport SPG (2012) states that Richmond should ensure a 'restrictive' approach towards the transfer of industrial land to other uses until 2031. Further to this, the GLA has recently published an Industrial Land Supply and Economy Study (2015) which demonstrates that Richmond borough has a very limited supply of industrial land with only 17.3 hectares of general and light industrial space and 8.1 hectares of warehousing and storage facilities, amongst the lowest of all the London boroughs. The borough's 'restrictive transfer' approach is highly likely to be retained within a new London Plan.</p> <p>In addition, the Council has carried out extensive research and assessed and analysed the borough's existing industrial land and business parks. It demonstrates that there are only 22 sites across the borough that merit special protection as locally important industrial estate or business park, of which Sandycombe Centre is a key site. Therefore, draft Local Plan policy LP 42 Industrial Land and Business Parks identifies and lists all those locally important industrial estate or business park and gives them enhanced protection.</p>

New suggested sites

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
13.	Neil Wilton	Turing House Free School and the EFA have identified a potential permanent site, i.e. off Hospital Bridge Rd within Heathfield Ward. This has not been included in the Local Plan (overview map). The identification of this site contradicts the School Place Planning Strategy, which states that there are sufficient school places in the west of the borough until 2025. Majority of site is designated MOL, and development conflict with national and local planning policies.	It does not contradict the Strategy; what it actually states is that 'The opening of Turing House in 2015 and the proposed opening of the Richmond upon Thames College free school in 2017 mean that there will be sufficient places in the western half of the borough for the period covered by this strategy.' (page 15, point 25)
13.	Neil Wilton	Kneller Hall, as a result of the proposed MOD disposal for residential use, should also be considered, in particular as much of this land is designated MOL.	Comment noted. It is not proposed to allocate this site as part of the Local Plan and therefore Local Plan policies will be applied to any emerging proposal on this site, such as those in relation to Metropolitan Open Land, community and social infrastructure and employment.
30.	Kevin Rice	The following sites should also be included in Hampton: 1. Alderson's Garage & Peco's showroom, 139-143 Station Road, Hampton plus 52 & 54 Station Road. (Currently the subject of a planning appeal.) 2. Kingsbury's Motors site, 45-49 Station Road, Hampton. (Currently the subject of a planning application.) 3. Former Yates Garage, 9 Tudor Road, Hampton	These sites are not considered to assist with the delivery of the Spatial Strategy of this Plan and therefore there is no proposal to include them as site allocations.
53.	Peter Dowling, Indigo Planning Limited on behalf of Sainsbury's Supermarkets Ltd	Sainsbury's, Lower Richmond Road, Richmond, TW9 4LT: This site is not included as a proposed site allocation. However, the Council's own evidence base identifies it as a key site to provide housing to assist in meeting housing targets. As such, we consider that the Sainsbury's site should be allocated within the Local Plan as suitable for mixed-use redevelopment, including residential uses and the retention or re-provision of the existing Sainsbury's supermarket on site. Evidence and justification has been submitted to demonstrate the principle of the suitability of the site for mixed-use development. Sainsbury's is keen to explore options to contribute to the redevelopment of the site and surrounding area where this assists the Council to meet the current and future demand for housing within the Borough. The site has significant potential to deliver a replacement foodstore which continues to provide a key shopping facility for the local community, whilst also delivering much needed new homes within the borough. A site allocation would need to clearly set out retention and re-	The comments have been noted and used to inform a new site allocation; see Local Plan proposal site SA 20 Sainsbury's, Lower Richmond Road, Richmond, which states that 'The Council will support comprehensive redevelopment of this site to provide for retail and residential uses. The continued use of the site as a foodstore and the re-provision of the existing retail floorspace is required.' It should be noted that the site allocations within the draft Local Plan do not set out a range of residential units because the appropriate number and mix of units will be informed by the character and context of the surroundings as well as local need, taking account of policies of the Plan such as on housing, design and character etc.

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		<p>provision of existing use as supermarket / foodstore.</p> <p>Suitability of site for housing was identified in the Local Housing Availability Assessment in February 2008, as well as in the AMR for 2013/14, with the potential for between 60 and 255 new residential units, depending on building heights.</p> <p>Sainsbury's is willing to work with the Council to look at options to bring the site forward; initial analysis of the potential capacity has already been undertaken, and the site could accommodate somewhere in the region of 350 – 500 new dwellings in addition to the re-provision of the store.</p>	
54.	Caroline Wilberforce, Indigo Planning Limited obo Ashill Land Limited	<p>Allocation of land for residential development at 9 Tudor Road and 27 Milton Road, Hampton, TW12 2NH.</p>  <p>The site comprises a plot of land (0.12 hectares) which has frontages onto both Tudor Road and Milton Road. Up until 2011 the site and its buildings were used for car sales on the front forecourt facing onto Tudor Road, with car repairs and servicing carried out in the ancillary workshop to the north of the main commercial building. All of the commercial buildings are now vacant following the closure of the business in 2011.</p> <p>Evidence and justification has been submitted as to why this site</p>	<p>This site is not considered to assist with the delivery of the Spatial Strategy of this Plan and therefore there is no proposal to include a site allocation. Also note that the draft Local Plan's Spatial Strategy demonstrates that the Borough can meet its housing needs.</p>


Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		should be allocated for residential uses (family sized accommodation).	
55.	Tanja El Sanadidy, Indigo Planning obo Shepherd Enterprises Limited	<p>Object to designation as "key office area" in Hampton Wick, including land at 1D Becketts Place, Hampton Wick, KT1 4EW, owned by Shepherd Enterprises Limited. The owner is intending to implement a residential use at the site following the recently approved prior approval (15/3256/GPD15) from office (B1 use) to residential (C3). To support the making of the Article 4 Directions the council has carried out "significant research" as stated within the consultation document, but we have not been able to obtain this background information.</p> <p>Hampton Wick is defined as a neighbourhood centre, where the focus is on improving the provision of shops and services; it does not mention the provision of office or other B uses.</p> <p>Own analysis shows that the areas is an area of mixed use character and cannot be considered as a "Key office area". It is therefore inappropriate, due to the characteristics, to designate it as a "Key office area".</p> <p>We consider that the existing office/employment floorspace in mixed use areas such as this can be afforded sufficient protection through more general loss of employment policies rather than imposing unnecessarily restrictive designations.</p>	<p>The research referred to is available on the Council's public website. The Council considers that there is significant office accommodation in the Hampton Wick area which is not limited to the office accommodation off Lower Teddington Road. When in force the Article 4 Direction will only affect offices within the defined boundary.</p> <p>In a letter dated 17th March 2016 the DCLG have informed the Council that it does not intend to intervene with regard to the Article 4 Direction made on 4 September 2015. Therefore, the Article 4 Direction will take effect on 1st October 2016 and based on the above, it is considered that the 'Key Office Area' designation is justified.</p>
61.	Louise Spalding, Defence Infrastructure Organisation	<p>Kneller Hall: Mark Lancaster (Minister for Defence Personnel and Veterans) announced on 18 January 2016 the disposal of sites, including Kneller Hall. The announcement to release the site for disposal is part of the MOD Footprint Strategy, which aims to provide a smaller more sustainable estate in support of military capabilities by 2040. The site (Kneller Hall), as shown below, should be added to the list of sites to be allocated for development.</p>	<p>Comments noted. It is not proposed to allocate this site as part of the Local Plan and therefore Local Plan policies will be applied to any emerging proposal on this site, such as those in relation to Metropolitan Open Land, community and social infrastructure and employment.</p>


Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		 <p data-bbox="555 880 1370 1423"> The site will be available for development during the local plan period; it is suitable for mixed use development, which respects the MOL and achieves a lasting use for the listed building of Kneller Hall. The intention to review the following is supported and we will engage in debate on the following policies in the next stage of the local plan. CP1 Sustainable development DMSD1 Sustainable Construction DMOS2 Metropolitan Open Land DMOS6 Public Open Space DMDC4 Tree Strategy:- the balance between protection of existing trees and planting of new ones on a qualitative basis CP14 Housing :- policy should follow the results of the SHMA CP15 Affordable housing DMHD2 conservation of listed buildings DMHO4 Housing mix and standards DMH06 Delivering affordable housing CP16 Local services/Infrastructure CP19 Local business </p>	

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		DMEM1 CP20 Visitors and tourism	
65.	James Sheppard, CBRE obo CBRE Global Investors (‘CBREGI’)	<p>Heathlands Industrial Estate, Heath Road, Twickenham: disagree with proposed protection of key employment land because the site is unsuitable for ongoing employment use.</p> <p>Policy TWP2 of the Twickenham Area Action Plan states that “existing B2/B8 employment land should be retained unless it is inherently unsuitable for employment uses”. In addition to policy TWP2, the Local Plan consultation document proposes that in instances where an “industrial use may be considered detrimental to neighbours’ living conditions, there may be some justification to include a requirement that mitigation measures are fully explored before considering other uses”. In the case of Heathlands Industrial Estate, it is considered that on-site mitigation resulting in the adequate protection of residential amenity would not be feasible due to the proximity and overlooking of nearby residential properties (including of recently permitted residential development at 159 Heath Road). The current restrictions limit how effectively occupiers can operate and as such the site does not fulfil occupier requirements. Therefore, we fully advocate the release of this site from employment use primarily due to its negative impact upon the amenity of local residents and unsuitability for modern B2/B8 occupiers that require flexible / 24 hour operation.</p> <p>The site should be allocated for residential uses, which would be more appropriate given its location in a primarily residential area. A precedent has been set for residential in the granting of permission 159 Heath Road; and the AMR (2014) shows that there has been a significant under-delivery of affordable housing within the Borough.</p>	<p>The borough has a very limited supply of industrial floorspace and demand for this type of land is high in the borough. The GLA’s Land for Industry and Transport SPG (2012) states that Richmond should ensure a ‘restrictive’ approach towards the transfer of industrial land to other uses until 2031. Further to this, the GLA has recently published an Industrial Land Supply and Economy Study (2015) which demonstrates that Richmond borough has a very limited supply of industrial land with only 17.3 hectares of general and light industrial space and 8.1 hectares of warehousing and storage facilities, amongst the lowest of all the London boroughs. The borough’s ‘restrictive transfer’ approach is highly likely to be retained within a new London Plan.</p> <p>In addition, the Council has carried out extensive research and assessed and analysed the borough’s existing industrial land and business parks. It demonstrates that there are only 22 sites across the borough that merit special protection as locally important industrial estate or business park, of which Heathlands Industrial Estate is a key site. Therefore, draft Local Plan policy LP 42 Industrial Land and Business Parks identifies and lists all those locally important industrial estate or business park and gives them enhanced protection.</p>
75.	NHS England , NHS Property Services, Healthy Urban Development Unit (HUDU) and Richmond CCG	There is no mention of Richmond Royal Hospital site. South West London and St Georges Mental Health NHS Trust declared most of the Richmond Royal site surplus in December 2015. Plans for Richmond Royal and Barnes Hospital are part of the Trust’s estate modernisation programme.	The Richmond Royal Hospital site has not been suggested for inclusion in the Plan by the landowner.
78.	Katharine Fletcher, Historic England	Kneller Hall is being released by the Ministry of Defence. We would be pleased to discuss the heritage issues that the plan could include as guidance.	Noted.

Other comments made to the Local Plan Review Scoping Consultation:

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
6.	Caroline Brock, Kew Society	Support the proposal to bring the Core Strategy and Development Management Plan into a single Local Plan and the alignment of site allocations with the needs of the Borough. It would also be a great help if relevant SPDs could be cross-referenced in the Local Plan.	Support noted.
6.	Caroline Brock, Kew Society	Local needs and evidence base: also consider the House of Lords Select Committee which is currently examining National Policy for the Built Environment as well as the Select Committee on the Environment reports on air pollution, carbon emissions and noise and legal judgements on the UK's failure to comply with EU clean air requirements.	Noted.
6.	Caroline Brock, Kew Society	Could the Local Plan Review address the issue of reducing the length of time permitted between the granting of planning permission and the start of work on, particularly, commercial re-developments so that sites are not allowed to become derelict?	This is not a matter for the Local Plan.
9.	Shahina Inayathusein, London Underground Infrastructure Protection	No comments. Need to be consulted as statutory consultee on any planning application within 50 metres of the railway.	Noted.
10.	Philip Robin	In preparing a new plan for the Borough, do not simply regurgitate the NPPF and London Plan. Try to be visionary, keep the plan brief and consider introducing a policy where the larger sites have planning briefs prepared for them in due course when they come forward for development – it would be a far more satisfactory way to engage with the local community and is likely to lead to a better outcome on the ground.	Noted. Please refer to the strategic objectives, vision and spatial strategy of the draft Local Plan.
26.	Bryce Tudball, Royal Borough of Kingston	Generally supportive of Local Plan Review; no further comments.	Noted.
29.	Richard Geary	Local Plan review is supposed to take account of village planning; not seen much due regard for local residents over the past twelve years in the area between the railway and the A316, specifically around Crown Terrace / Sheendale Road, Victoria Villas TW9. Conservation Area Plan states that no development should be over 3-storeys high, yet a 5-storey development has been allowed, additional balconies have been added etc. Concerns regarding ignoring Area Plans, Conservation Areas etc. There are lots of sites in the borough that should be considered before there is any further development around Dee Road, Crown Terrace, Victoria Villas.	Comments noted. Local Plan matters raised as part of Village Planning processes have been taken into account. Draft Local Plan Policy LP 3 on Designated Heritage Assets specifically refers to Conservation Area Appraisals and Conservation Management Plans, alongside the Village Planning Guidance SPDs.

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
30.	Kevin Rice, Hampton Society	<p>There should be a formal connection between the Local Plan and Village Planning process going forward.</p> <p>Council should provide an annual report on the impact of the Local Plan strategy on each village, the issues, the outcomes, the funds raised from planning consents and grants plus any expenditure or investment undertaken; new issues could be identified as they arise.</p>	<p>Noted. Local Plan matters raised as part of Village Planning processes have been taken into account and Village Planning has been embedded and is a key element of the spatial strategy as set out in the Local Plan.</p>
41.	Rebecca Bilfinger, GVA obo Lady Eleanor Holles School	<p>Previously submitted representations on the emerging Site Allocations Plan in relation to the allocation of the school for education use and an amendment to the MOL boundary in order to support the expansion of the school.</p> <p>Evidence is submitted to support expansion of education facilities at LEHS including amendment to the existing MOL boundary (<i>red circle area shows proposed area to be removed from MOL</i>).</p> <p>Proposed Amended MOL Designation Plan</p> 	<p>See response to 41 above.</p>
50.	RPS Planning and development on behalf of S. Oxley	<p>Previously submitted representations on the emerging Site Allocations Plan with regard to the site shown below.</p>	<p>National guidance on Green Belt states that Green Belt boundaries [and MOL] should only be altered in exceptional circumstances.</p> <p>The draft Local Plan's Spatial Strategy demonstrates that the Borough can meet its housing needs without releasing open land that is protected by designations such as Green Belt or Metropolitan Open Land.</p> <p>This area has been designated as MOL since 1985. The issue of whether this was an appropriate designation was</p>

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
		 <p data-bbox="555 785 1370 1024">Planning consent was granted for a large detached dwelling towards the eastern end of the site in the 1950's; consent for a replacement dwelling on the site in 1998, with the permission renewed in 2005 and again in 2010. In 2012, planning consent was granted on appeal for the demolition of the existing dwelling and ancillary buildings; the new dwelling has now been erected. Evidence has been submitted to demonstrate that this site does not meet the London Plan MOL criteria.</p>	<p data-bbox="1406 210 2110 635">considered at the UDP Public Inquiry in 2001. The Inspectors Report (August 2001, para 5.69) concluded that the designation was appropriate as although the site cannot be readily seen from adjoining land, its character and appearance relate more closely to Palewell Common and Richmond Park. The site forms part of the large swathe of MOL to the east and south and its open character contribute towards the separation of East Sheen from Roehampton. Since 2001 the NPPF was published in 2012 and the London Plan in 2011, the Council sets out a reassessment of this site against these policies below. It is evident that this site and the overall area fulfil at least 3 out of 4 criteria for designating MOL as defined within the London Plan. Taking these criteria in turn:</p> <ul style="list-style-type: none"> <li data-bbox="1406 641 2110 1161">a) With the exception of the part of the site where the new dwelling has been erected, the whole site contributes to the physical structure of London by being distinguishable from the built up area. A large part of the site, particularly the western side, is open and therefore not part of the built up area. The site provides a distinct break from the more prevalent urban fabric of the built up area to the north. In relation to the strategic and wider MOL area, this is of significance to London as a whole or in part, by providing an attractive break in what could otherwise be a continuous urban development. Therefore, it fulfils criterion 1 of the London Plan policy as this site is 'clearly distinguishable' as a break in the prevailing urban fabric elsewhere in the area, particularly to the north. Whether or not there is public access to this site is not part of the MOL criteria for designation. <li data-bbox="1406 1168 2110 1279">b) It is acknowledged that the site does not contain any open air facilities which serve the whole or significant parts of London and therefore does not meet this criterion. <li data-bbox="1406 1286 2110 1436">c) The site itself and in particular the overall area contain features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value. The site has a largely open character and provides an important link and habitat by being situated adjacent to

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
			<p>Richmond Park, which is SSSI, National Nature Reserve and SAC, as well as nearby Palewell Common, which is designated OSNI.</p> <p>d) It is evident that this site forms a link in the network of green infrastructure and meets one of the above criteria – it provides a link or stepping stone and by virtue of its location with Palewell Common to the east and Richmond Park to the south, it is considered of having great importance to the local as well as wider green infrastructure network.</p> <p>The Council's position is therefore that this piece of land is appropriately designated as it fulfils the required criteria within the London Plan MOL policy.</p> <p>The respondent does not indicate a desire for developing the western part of the land that currently has no buildings or structures. Therefore, should any further proposals for the site come forward, they can be assessed in line with MOL policies.</p>
51.	Tim Catchpole, Mortlake with East Sheen Society	Mortlake Station – this is shown on your Borough-wide map of development sites but there is no site description like there is for the other four sites.	Noted. This has been amended.
64.	Tor Baret, Nathaniel Lichfield & Partners obo The Harrodian School	Support for the proposed alteration of the MOL at Harrodian School.	Support noted.
63.	Daniel Osbourne, Barton Wilmore obo Quantum Group	Teddington Sports Ground, former Imperial College London sports ground – The Quantum Group's ideas for the site have not yet been sufficiently developed to enable us to usefully participate in this current discretionary consultation phase on the Local Plan. The intention is to establish a future strategy for the site over the next few months. We intend to take part in the formal consultation process on the new Local Plan, which we understand is likely to be consulted upon later this year.	Comments noted.
70.	Andree Gregory, Highways England	No comments.	Noted.
71	Pauline Holmes, Natural England (Thames Valley Team)	Comments submitted in relation to the Sustainability Appraisal Scoping Report.	Please refer to the separate responses analysis carried out in support of the final version of the Sustainability Appraisal, which is available on the Council's website at: www.richmond.gov.uk/sustainability_appraisal_local_plan.htm

Ref. no.	Name / Organisation	Summary of comments	Officers' comments
72.	Samantha Davenport, Natural England (Dorset Hampshire Isle of Wight)	Comments submitted in relation to the Sustainability Appraisal Scoping Report.	Please refer to the separate responses analysis carried out in support of the final version of the Sustainability Appraisal, which is available on the Council's website at: www.richmond.gov.uk/sustainability_appraisal_local_plan.htm
75.	NHS England , NHS Property Services, Healthy Urban Development Unit (HUDU) and Richmond CCG	There is a need for purpose built properties that deliver the provision of integrated primary and community healthcare services through the joint Outcome's Based Commissioning programme. We welcome the opportunity to update the Local Plan evidence of health needs and estate requirements and review the infrastructure delivery schedule and CIL Regulation 123 List to ensure it reflects and supports the CCG strategies. In particular policies should support the aim to improve access to primary care, which in some cases will involve extending GP surgery opening hours, and should support the re-use of social infrastructure and the co-location of services.	Existing health facilities are protected and new facilities are encouraged in line with draft Local Plan Policy LP 28 on Social and Community Infrastructure. In addition, draft Local Plan policy LP 30 on Health and Wellbeing specifically states that applications for new or improved facilities or loss of health and social care facilities will be assessed in line with the criteria set out in the Social and community infrastructure policy.
76.	James Togher, Environment Agency	Comments submitted in relation to the Sustainability Appraisal Scoping Report.	Please refer to the separate responses analysis carried out in support of the final version of the Sustainability Appraisal, which is available on the Council's website at: www.richmond.gov.uk/sustainability_appraisal_local_plan.htm
77.	Ann Holdsworth, Amec Foster Wheeler obo National Grid	No comments.	Noted.
78.	Katharine Fletcher, Historic England	Comments submitted in relation to the Sustainability Appraisal Scoping Report.	Please refer to the separate responses analysis carried out in support of the final version of the Sustainability Appraisal, which is available on the Council's website at: www.richmond.gov.uk/sustainability_appraisal_local_plan.htm
80.	Laura Stritch, Transport for London Property	London Buses are the freeholder of Twickenham Bus Station, Station Yard, identified as proposal site TW2 in the Twickenham Area Action Plan. Subject to the operational status of the bus standing facility, TfL Property would welcome a partnership with Network Rail (subject to agreement) and London Buses to bring forward a viable and comprehensive development at this site, and as such for it to remain an allocated proposal by the council and travel from the Twickenham AAP into the Site Allocations DPD. Further details on capacity can be provided to the council upon request.	Note that the Council adopted the Area Action Plan (AAP) for Twickenham Town Centre in 2013, which sets out detailed policies and site-specific proposals for Twickenham town centre. The AAP including its site-specific proposals will remain as existing due to its relatively recent adoption.

Table 2: Summary of all responses received to the Local Plan Review scoping consultation, including officer's comments