

Appendix 15 – Regulation 19 comments

The [summary of main issues raised during the Publication Local Plan \(Regulation 19\) consultation and summary of the Council's response \(January 2024\)](#) can be found on the Council's website.

Policy 1 Living Locally

- From Summary of Main Issues: Some broad support for the 'living locally' concept set out in Policy 1, including from some organisations with similar objectives and how particular sites can contribute. Some concerns (Gary Hageen, Elena Mikhaylova, Richmond Society) about restrictions on movement and the consultation on this policy. Some concerns about particular aspects of implementation including the definition of the 20-minutes (CPRE London, Jon Rowles), provision for those less mobile (Richmond Society), importance of safe cycle routes and parking (Julie Scurr), reference to protecting and enhancing open space (London Historic Parks and Gardens Trust), and whether there could be better support for the rail network (Network Rail).

Policy 2 Spatial Strategy

- From Summary of Main Issues: A few comments on specific aspects of Policy 2 and the spatial strategy, along with some support. Royal Botanic Gardens Kew comment the key diagram should not identify a large proportion of Kew Gardens as within the incremental intensification area and an area deficient in public open space, as may facilitate inappropriate development. Mortlake with East Sheen Society raise concerns on the order of the plan leading with the spatial strategies, and the boundaries of these nine areas, particularly with the older parish boundary and relationship with Richmond Park. Old Deer Park Working Group and Prospect of Richmond reiterate comments on limited population growth and the places where it will decline, although emphasising prosperity will be increasing.

Policy 7 Waste and the Circular Economy

- From Summary of Main Issues: Arlington Works raise the future use of the site, as the waste use ceased more than 5 years ago and there is no reasonable prospect of an application coming forward for a waste use, therefore the Local Plan is the most appropriate way to release the site. Surrey County Council raise reference should be made in the policy to the waste hierarchy, and to the National Planning Policy for Waste in terms of determining applications for non-waste development in the context of sustainable waste management. The Environment Agency request a reference in the policy to a Construction Environment Management Plan.

Policy 21 Protecting the Local Economy

- From Summary of Main Issues: A number of respondents raise the policy position particularly in Policy 21 on no net loss is too restrictive (The Offer Group Ltd, Notting Hill Genesis). A number of comments relate to sector and/or site-specific conditions that necessitate a different policy approach in these cases i.e. to the employment sites they're commenting on. Also specifically in relation to Protecting the Local Economy (Policy 21), The Royal Parks note the Parks offer opportunities for economic spin-offs, and specifically in relation to Promoting Jobs and our Local Economy (Policy 22) raise concern the increase in workers increases footfall in the Parks and the need to protect and mitigate additional pressures.

Policy 26 Visitor Economy

- From Summary of Main Issues: the Rugby Football Union (RFU) wish to see Twickenham Stadium referenced in the policy, and similarly The Royal Parks wish to see the Parks referenced. The Theatres Trust support the approach to supporting cultural facilities.

Policy 28 Local Character and Design Quality

- From Summary of Main Issues: comments relate to specific issues. National Gas / National Grid Electricity Transmission raise standards of design and sustainable development and the need to promote a creative approach to new development around high voltage overhead lines and other NGET assets, suggesting reference is added to the policy to respecting existing site constraints including utilities to be consistent with national policy. The Royal Parks raise Richmond and Bushy Parks should be specifically referenced in the policy given their importance. St George plc and Marks and Spencer raise part B is unsound and should reference contribution to enhancing local environment and character only where appropriate. Prospect of Richmond and Old Deer Park Working Group raise there should be reference to Conservation Areas as well as the character areas and places identified in the Urban Design Study.

Policy 29 Designated Heritage Assets

- From Summary of Main Issues: Avanton Richmond Developments LTD and St George plc and Marks and Spencer raise the policy is not consistent with the NPPF in respect of where there is harm to a designated heritage asset, and how this might be outweighed by public benefits. Avanton Richmond Developments LTD also raise there should be no requirement to reinstate original features. Udney Park Playing Fields Trust urge the Council to review the draft Conservation Area Appraisal.

Policy 30 Non-designated Heritage Assets

- From Summary of Main Issues: Avanton Richmond Developments LTD and St George plc and Marks and Spencer raise the policy is not consistent with the NPPF as there is no requirement in national legislation or policy to preserve or enhance the significance of non-designated heritage assets. Udney Park Playing Fields Trust welcome the designation of the Udney Park Pavilion as a registered War Memorial and BTM, but noting its deterioration urge the Council to use statutory enforcement powers to protect locally-listed buildings. The London Historic Parks and Gardens Trust comment it is not clear where locally listed historic parks and gardens' have been collated and note their inventory may provide a basis.

Policy 31 Views and Vistas

- From Summary of Main Issues: a number of comments were received but these refer to the Draft Local Views SPD which was subject to consultation in 2022, with the majority of comments relating to the inclusion or exclusion of specific views.

Policy 34 Green Belt and Blue Infrastructure

- From Summary of Main Issues: Udney Park Playing Fields Trust support the recognition of Udney Park to the ecology network. London Historic Parks and Gardens Trust raise the policy

should additionally seek opportunity to create new green open space. The Royal Parks welcome recognition of role of green infrastructure in reducing recreational impacts on sites such as Richmond Park, but raise specific reference to designations in the Parks should be made within the policy.

Policy 35 - Green Belt, Metropolitan Open Land and Local Green Space

- There was a representation by CPRE London about the policy not being consistent with the London Plan or NPPF and leaving MOL open to threat from development, but no other comments relate specifically to the principles of the policy approach and the majority of comments relate to Green Belt/MOL boundaries on specific sites. [The GLA on behalf of Mayor of London did not raise any objection or conformity issues in relation to the policy.]

Policy 40 Rivers and Corridors

- From Summary of Main Issues: Friends of the River Crane Environment (FORCE) raise requirements that should also apply to the River Crane, and seek clarity in policy or SPD to protect all river corridors as dark corridors. Port Hampton Estates Limited generally support the policy, but consider that it needs to address the situation where site specific conditions may preclude meeting all or some of these objectives; alternatively could be addressed in the text/policy for Platts Eyot. The Environment Agency seek stronger reference in this policy including to setback and culverted watercourse, landscaping and ecological management plans, the need to bring all waterbodies in the borough into good ecological status/potential in line with WFD requirements, and the biodiversity net gain where it will apply to the river habitat.

Policy 46 Amenity and Living Conditions

- No representations on the Regulation 19 Plan were received on this policy.

Policy 47 Sustainable Travel Choices

- From Summary of Main Issues: there are a number of detailed comments on the overall approach and specific aspects of the policy, also with some support. National Highways raise the policy sets out the need to assess the impacts of development and consult National Highways if the proposals share a boundary with the SRN or are likely to generate a significant/severe impact on the SRN, however for Local Plan allocations expect traffic impacts and any mitigation or capacity enhancements to the SRN necessary to deliver the strategic growth should be identified as part of the plan-making process; not had sight of any traffic modelling affecting the SRN, should it affect the SRN, or any input to the IDP, and would appreciate clarification and confirmation. Transport for London (TfL) raise public transport capacity constraints may apply in higher PTALs and the wording in Part B should make it clearer there is a potential requirement for contributions in all areas regardless of PTAL, and Part C should refer to implementing measures identified through an Active Travel Zone (ATZ) Assessment. Network Rail raise the policy should be broadened to include improving access to rail stations where new developments are in close proximity, and agree with appropriate safeguarding of land which should be based on existing and future operational requirements. Jon Rowles raises opportunity areas in Hounslow and Kingston will result in more traffic in Richmond and impacts include provision for cyclists. Surrey County Council consider any impacts on Surrey's transport network would need to be

assessed and any appropriate mitigation measures identified and funded. Elmbridge Borough Council note the strategic transport modelling for the London Plan but consider there should be an up to date assessment of any potential cross boundary or cumulative impacts on the road network outside of the borough, and welcome future engagement on this issue. Mortlake with East Sheen Society note the evidence base does not include any borough-based transport studies and that there is no detail on TfL carrying out an assessment of orbital journeys, and raising concern about the lack of improvements around Mortlake Station and why improvements at stations affected by development are not funded. Councillor Niki Crookdake raises concern about the impact of extensive development in the east of the borough, in the context of existing constraints and congestion, with unprecedented growth planned on a number of site allocations that will create a significant burden on transport infrastructure; consider the evidence base taken from the Local Implementation Plan is out of date and has been raising concerns over the lack of evidence that the cumulative impact has been considered including with neighbouring boroughs, and there is a lack of transport infrastructure improvements and developer mitigation identified. National Highways also raise that they cannot be a party to Section 106 contributions and funding for infrastructure or mitigation cannot be assumed. Elena Mikhaylova raises concern the policy limiting use of cars breaches human rights and the Equality and Disabilities Act.

Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management

- From Summary of Main Issues: CPRE London raise car free development and that the site allocations should not specify minimum levels of car parking, and the vehicle crossovers policy should be extended to promote the reinstatement of front gardens and ensure priority to bus and cycle lanes and safe pavements. Transport for London (TfL) raise: a Parking Design & Management Plan should be required as guidance is due to be issued; car club spaces may not be appropriate in areas of high PTAL; there may be a need to consider on-street disabled parking on constrained sites. McCarthy & Stone Retirement Lifestyles Ltd raise older persons housing schemes should be exempt from providing car free developments.

Policy 53 Local Environment Impacts

- From Summary of Main Issues: Thames Water raise the Plan should consider the impact of any development within 800m of a sewage works and 15m of a pumping station and whether an odour impact assessment is required. National Physical Laboratory (NPL) offer input into ensuring air quality targets are achieved. The Environment Agency acknowledge part M of the policy deals with land contamination but raise that part I should reference specific requirements for waste sites.