



Local Plan Publication Consultation

From 9 June 2023 to 24 July 2023

RESPONSE FORM

The Council is inviting comments on the Publication version of the Local Plan.

The Local Plan sets out a 15-year strategic vision, objectives and the spatial strategy. The draft Plan includes place-based strategies covering the whole borough, along with accompanying site allocations, as well as the thematic planning policies that will guide future development in the borough. It will inform how growth will be accommodated across the borough. The draft Plan seeks to address future challenges including climate change, health, affordability and liveability.

This consultation is the final opportunity to comment on the Local Plan before it is submitted to the Secretary of State for independent 'examination in public'. At this stage in the plan-making process, in accordance with the national guidance, consultation responses should focus on whether the Local Plan has been developed in compliance with the relevant legal and procedural requirements, including the duty to cooperate, and with the 'soundness' of the Plan. Further detail on these concepts is provided in the accompanying guidance notes available on the website (via the link below).

How to respond

Please read the consultation documents and other background information made available on the Local Plan website: www.richmond.gov.uk/draft_local_plan_publication_version

You can respond by completing this form, either electronically using Word or as a print out, and sending it to the Council by:

- Email to LocalPlan@richmond.gov.uk
- Post a hard copy of the form to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ.

Alternatively, you can make comments on the draft Local Plan **online via our Consultation Portal**, which is accessible at the website listed above.

All responses must be received by 11:59pm on Monday 24 July 2023. The consultation is open to everyone; however please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

This form has two parts:

- Part A – Personal details and about you
- Part B – Your detailed response(s).

Part A: Personal Details		
	1. Personal Details *	2. Agent's Details (if applicable)
Title		Mr
First name		Neil
Last name		Henderson
Job title (where relevant)		Partner
Organisation (where relevant)	Reselton Properties	Gerald Eve LLP
Address		One Fitzroy, 6 Mortimer Street
Postcode		W1
Telephone		
E-mail address		████████████████████

*If an agent is appointed, please complete only the title, name and organisation boxes but complete the full contact details of the agent.

Data protection

The Council is committed to ensuring that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Council's Privacy Notice is published on the webpage www.richmond.gov.uk/data_protection

All responses will be held by the London Borough of Richmond upon Thames. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

If you submit comments, the consultation responses and your personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Response

3. To which part(s) of the draft Local Plan does your response relate to?

Please indicate the documents **and** the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Publication Local Plan (including changes to the Policies Map designations)	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	4, 11, 45
		Place-based strategy	
		Site Allocation(s) no./ name	
		Maps	
		Tables	16.1
Sustainability Appraisal Report	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach)	<input type="checkbox"/>		

4. Do you consider the Local Plan is:

4.1 Legally compliant	Yes <input type="checkbox"/>	No <input type="checkbox"/>
4.2 Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.3 Complies with the Duty to Co-operate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Further information on these terms is included within the accompanying guidance note, which can be found on the website at www.richmond.gov.uk/draft_local_plan_publication_version

If you have entered 'No' to 4.2, please continue with Q5. Otherwise, please go to Q6.

5. Do you consider the Local Plan is unsound because it is not:

5.1 Positively Prepared	<input checked="" type="checkbox"/>
5.2 Justified	<input checked="" type="checkbox"/>
5.3 Effective	<input checked="" type="checkbox"/>
5.4 Consistent with national policy	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified at 6 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

We wish to reiterate our comments made in Response to the Regulation 18 Consultation process, dated 31 January 2023.

Policy 4, Table 16.1 - Reselton fully support measures to minimise greenhouse gases and promote energy efficiency. However, collectively with the Mayors carbon off set payment, the proposed carbon offset of £300/t would equate to a payment nearly 4 times the current value. While technology is still evolving to meet these ambitious enviromental targets, the carbon offset payment is more likely to be required intially. With such a high tarrif increase, this may render many schemes unviable, particularly where there is an ambition to meet other priorities such affordable housing. It is therefore suggested that, where it can be demonstrated that a payment in lieu is required, there should be discretion in the policy to allow this payment to be directed to other priorities in the Development Plan where it is considered appropriate to do so.

Policy 11, Sub Section D - Reselton welcome a balance which provides greater weight to intermediate tenure (70:30). A greater proportion of intermediate housing can often make a significant difference to the viability of a development. For example, a policy compliant approach of 70:30 may only be able to deliver 100 units of affordable housing. However, significantly increasing the proportion of intermediate to, say, 50:50, may result in a significant increase in affordable units overall e.g 140 units. This has the potential to deliver no less social rented housing but significantly more affordable housing overall. As a result it is considered there should be flexibility in the policy to allow for different tenure splits where the outcome dilvers broadley the same social rent quantumn but allows for a significantly greater quantumn of afforable housing overall.

Policy 45, Sub Section A- The policy as drafted is too prescriptive and gives no opportunity for consideration of detailed design being able to influence the extent to which a location is capable of being able to accommodate a tall bulding. This is particularly the case when identifying indivudal areas for a mixture of tall and mid-rise zones. The precise location within the zones for tall buildings should be subject to detailed design and consideration against the tall buildings policy framework of D9. It is therefore suggested that the drafting should be amended as follows "Proposals for tall buildings will NORMALLY only be appropriate in tall building zones". Appendix 3 and the Policies

Map do not appear to have been issued for consultation so we reserve the right to comment further on the issue at Reg 19 Stage.

Please continue on a separate sheet / expand box if necessary.

8. Do you consider it necessary to participate in examination hearing session(s)? (Please tick box as appropriate)

No, I do not wish to participate
In hearing session(s)

Yes, I wish to participate
In hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be

asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Reselton are a long term landowner in the Borough and are involved in the Stag Brewery redevelopment, one of the largest schemes in the Borough.

Please continue on a separate sheet / expand box if necessary.

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box.



Signature:

NT Henderson

Date:

24 July 2023

For electronic responses a typed signature is acceptable.