

**LONDON BOROUGH OF RICHMOND UPON THAMES**

**LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC**

**WRITTEN STATEMENT**

**MAIN MATTERS 4 - 12:**

**PLACE-BASED STRATEGIES**

**WEDNESDAY 26 JUNE 2024**

Main Matter 4 – Hampton and Hampton Hill (Site Allocations 1–5)  
Main Matter 5 – Teddington and Hampton Wick (Site Allocations 6–9)

**THURSDAY 27 JUNE 2024**

Main Matter 6 – Twickenham, Strawberry Hill & St Margarets (Site Allocations 10–19)  
Main Matter 7 – Whitton & Heathfield (Site Allocations 20 – 22)  
Main Matter 8 – Ham, Petersham & Richmond Park (Site Allocations 23 – 24)

**TUESDAY 2 JULY 2024**

Main Matter 9 – Richmond & Richmond Hill (Site Allocations 25 – 30)  
Main Matter 10 – Kew (Site Allocations 31 – 34)  
Main Matter 11 – Mortlake & East Sheen (Site Allocations 35 – 38)  
Main Matter 12 – Barnes

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## ***Abbreviations***

BID – Business Improvement District

BNG – Biodiversity Net Gain

c/o – care of

CPZ – Controlled Parking Zone

DtC – Duty to Cooperate

GLA – Greater London Authority

IDP – Infrastructure Delivery Plan

LBRuT – London Borough of Richmond upon Thames

LDS – Local Development Scheme

LP – The London Plan

Local Green Space - LGS

LPG – London Plan Guidance

MM – Main Matter

MOL – Metropolitan Open Land

NNR – National Nature Reserve

NP – Neighbourhood Plan

NPPF – National Planning Policy Framework

OOLTI – Other Open Land of Townscape Importance

PINS – Planning Inspectorate

PPG – Planning Practice Guidance

PTAL – Public Transport Accessibility Level

RBID – Richmond Business Improvement District

RLP – Richmond Local Plan

SA – Sustainability Appraisal

SAC – Special Area of Conservation

SCI – Statement of Community Involvement

SINC – Site of Importance for Nature Conservation

SoCG – Statement of Common Ground

SPD – Supplementary Planning Document

SPG – Supplementary Planning Guidance

SPPS – School Place Planning Strategy

SSSI – Site of Special Scientific Interest

TfL – Transport for London

WFD – Water Framework Directive

**LONDON BOROUGH OF RICHMOND UPON THAMES**  
**LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC**  
**WRITTEN STATEMENT**

**Main Matter 4 – Place Based Strategies and Site Allocations**  
**Hampton and Hampton Hill (Site Allocations 1 – 5)**

**WEDNESDAY 26 JUNE 2024**

**COUNCIL RESPONSES TO MAIN MATTER 4**

Document version:06/06/2024

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**Question 4.1 Is the area strategy and are the site allocation policies justified by appropriate available evidence, having regard to national guidance and local context; and are they in ‘general conformity’ with the LP?**

The Area Strategies in the Local Plan have been developed using a consistent approach having regard to national guidance, the London Plan and the local context. Rather than repeating this across each of the Main Matters 4-12, for the sake of brevity the Council’s response is set out once, in an overarching document for Main Matters 4-12: Place-based strategies. Each of the Main Matter Statements in relation to each individual area strategy and site allocation policies will therefore only cover matters of relevance to that place.

Please refer to the Council’s response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Hampton & Hampton Hill and Site Allocations (Chapter 6) are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

**Question 4.2 Do the housing site allocations show how they will contribute to the achievement of the RLP’s overall housing requirement over the plan period and the timescale for delivery?**

Please refer to the overarching document on the Place-Based Strategies containing the Council’s overall response to housing delivery and the site allocations. These are the Site Allocations in this area which have the potential to contribute to housing delivery as follows:

Site Allocation 2: Platts Eyot – the Site Allocation suggests delivery could come forward in the short term, with potential for some residential development. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.

Site Allocation 3: Hampton Traffic Unit – the Site Allocation suggests delivery could come forward in the short-term, recognising there is a residential permission granted. The Housing AMR 2022/23 (SD-079) trajectory includes for non-self contained in years three to five (2023/24 to 2027/28).

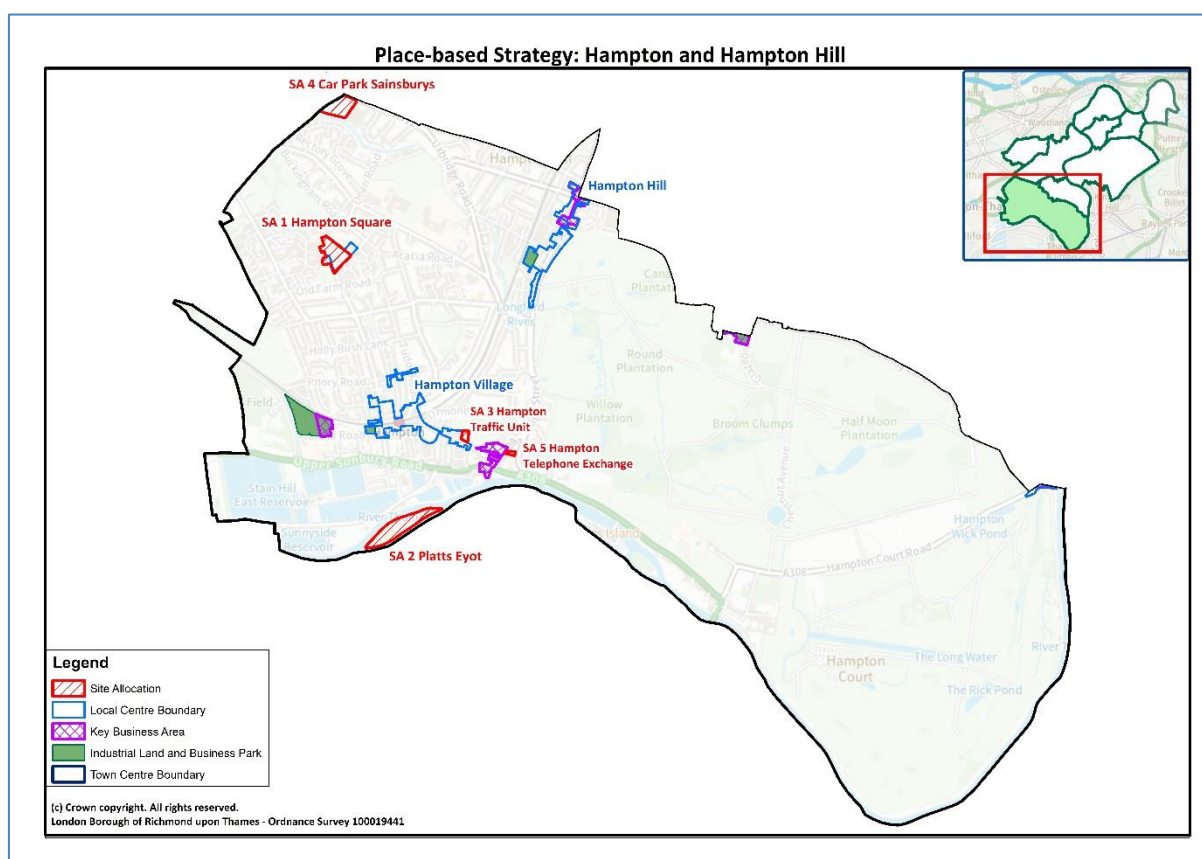
Site Allocation 4: Car Park for Sainsburys – the Site Allocation suggests delivery could come forward in the medium term, for affordable housing. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory

Site Allocation 5: Hampton Telephone Exchange – the Site Allocation suggests delivery could come forward in the medium to long term, with a residential element. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.

There is no housing delivery expected from Site Allocation 1: Hampton Square.

**Question 4.3 Is it clear how the expectations for employment, commercial, retail, social and community infrastructure will contribute to an evidenced need?**

Please refer to the overarching document on the Place-Based Strategies containing the Council’s response to this question.



Hampton Hill and the dispersed centre of Hampton Village are classified as local centres in the borough centre hierarchy (set out in Policy 17). Hampton Nursery Lands is classed as an Important Local Parade. Whilst none of these centres are large enough to be included in the Mayor’s Town Centre Network (Annex 1 of the London Plan) they are important and valued centres in meeting the needs of residents and visitors. More information and analysis, including review of the borough’s centre hierarchy can be found in the Assessment of Borough Centres (SD-065).

It is noted that in Table 2a of the Summary document to SD-065, Hampton Village and Hampton Nursery Lands are identified as clearly serving residents which are relatively disadvantaged, where there is poor public transport accessibility and is serving communities living in an identified gap in provision.

The map above also shows the location of the three Key Business Areas at Kingsway Business Park to the west, Thames Street, Hampton and High Street Hampton Hill. This area includes three Industrial Land and Business Parks at Kempton Gate Business Park to the west, Oldfield Road, Hampton and St Clare's Business Park which is currently subject to a planning application for a commercial and residential development which the Council's Planning Committee resolved to approve on 11 October 2023, subject to a legal agreement.

Hampton & Hampton Hill hosts a range of social and community infrastructure uses including Hampton Hill Library, Linden Hall Community Centre, Bushy and Home Parks (designated SSSI), Hampton Common, and Hampton & Richmond Borough Football Club. Hampton Square (Site Allocation 1) contains an array social and community infrastructure uses including White House Family Hub, Hampton Youth project, and Hampton Ale Public House. There are several educational uses within the area including the recently expanded Clarendon Primary Centre (special school), Hampton School, and Buckingham Primary School.

### Representations

The Royal Parks made representations to the Local Plan (Pre-Publication) Regulation 18 and (Publication) Regulation 19 consultations (Rep Nos. 285 and 84 respectively) suggesting reference to protection of open space, to reflect risk with recreational pressure. The place-based strategy was amended to reference the protection of open space and reference to the recreational pressures was added to the area profile, as already acknowledged elsewhere in the draft Plan.

Thames Water have made representations in relation to land to the west of Stains Hill West Reservoir (Rep No. 85) & Hyde's Field – Land to the north of Hampton Water Treatment Works (Rep No. 86) both of which are considered in the Council's response to Main Matter 14.

A number of comments have been made in relation to Tall and Mid-Rise Building Zones in particular in relation to the St Clare Business Park and appropriateness for five storey development (Rep Nos. 87-119). These comments are addressed in the Council's response to MM 18 question 18.6.

Site Allocations: What is expected to be delivered?

Site Allocations located in this area are shown on the map above and considered below.

A number of comments were received during the Local Plan (Publication) Regulation 19 consultation on the following site allocations. For ease, where modifications are agreed, these have been included within the schedule of modification table located at the end of this statement.

- Site Allocation 1 – Hampton Square, Hampton

TfL commented on Site Allocation 1 – Hampton Square that whilst they welcome the reference to car parking provision in line with London Plan standards, there is concern that the use of the word ‘retain’ could be misinterpreted as requiring the existing level of provision.

Please refer to the Council’s response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water’s representation.

- Site Allocation 2 – Platts Eyot, Hampton

Port Hampton Estates Limited noted their general support (Rep No. 122) but raised that the existing cottage should be referred to in the existing land use, that the planning history should reflect discussions with the landowner and that there should be reference to improved vehicular access to support and facilitate redevelopment. A modification to reference at Part A the avoidance of harm is proposed (SA2.2) in LBR-002, and see also the table at the end of this statement for relevant extracts. The ‘planning history’ box within the ‘Context’ section cites planning applications or, where these have been publicly consulted on, pre-application discussions. This does not apply to this site. With regards the vehicular access, the Environment Agency previously raised concerns at (Pre-Publication) Regulation 18 stage (Rep. No. 291) (SD-007) on grounds that any access arrangements on the island should not result in a loss of riparian habitat, flood storage or ability to maintain flood defence assets. Further, Elmbridge Borough Council, in their representation (Rep No. 125) welcome the need to ensure safe access to and egress from the island to the Environment Agency’s satisfaction, noting the existing restricted access and flood constraints. It is considered that the site allocation as worded provides a framework to assess proposals.

Elmbridge Borough Council also raise that, whilst the inclusion of an expected implementation timetable is welcome, it would be useful for an indicative level of development in terms of employment floorspace and number of homes. Please refer to Council’s response in the Overarching Statement for place-based strategies and site

allocations question 4-12.1 with regards the rationale for level of detail within the site allocations.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

Please also see below the Council's response to question 4.4.

- Site Allocation 3 – Hampton Traffic Unit, 60-68 Station Road, Hampton

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 4 – Car Park for Sainsbury's, Uxbridge Road, Hampton

TfL sought a reference in the vision (Rep No. 128) that parking standards are consistent with the London Plan. A modification (SA4.1 in LBR-002) has been agreed with TfL in the Statement of Common Ground (SOC-03) to amend the reference to parking in the vision to ensure consistency with London Plan Policy T6.

Sainsburys Supermarkets Ltd, whilst supportive of the removal from MOL and reprovision of petrol station and parking for the foodstore, raise concern that allocation for 100% affordable housing is not justified and that reference to 20% biodiversity net gain should be removed. Please refer to the Council's response to MM17 questions 17.1 and 17.7

CPRE London raise that the site allocation should support a mixed-use development with no surface car parking. Please see the Council's response above with regards to reference to London Plan Policy T6.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 5 – Hampton Telephone Exchange, 34 High Street, Hampton

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

**Question 4.4 Would the location of Site Allocation 2 Platts Eyot, Hampton contribute to the achievement of sustainable development, including in relation to flood risk?**

As set out in the Council's statement on Main Matter 1: Legal Requirements and Overarching Issues, the Local Plan aims to meet the needs of local communities and businesses in a sustainable way whilst balancing the three overarching, independent and mutually supportive objectives; economic, environmental and social. As a site allocation, Platts Eyot, Hampton is considered to be capable of contributing towards each of these objectives of sustainable development.

In relation to economic sustainability, the vision for the site allocation sets out that any development would need to involve the protection the island's unique employment and business uses, particularly the river-related uses, including the docks, wharves and slipways. To retain and enhance the existing economic activity on the island.

Environmental sustainability is promoted in a number of ways. The vision for the site allocation clarifies that areas of Green Belt development will need to be appropriate as per the requirements of the NPPF. Furthermore, that development will be expected to ensure that designated heritage assets, and the wider character of the island, are improved and enhanced, including the appropriate restoration of listed buildings which were damaged in the 2021 fire. Any redevelopment should ensure that it establishes a positive relationship with the adjoining River Thames, having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD. Finally, the vision also details that any scheme would need to ensure safe access to and egress from the island, to the Environment Agency's satisfaction, noting the existing restricted access and flood constraints. This challenge may limit the amount of residential development appropriate on the site. Very limited vehicular access may be appropriate, provided this does not adversely impact on the character and appearance of the island.

The social element of sustainable development is acknowledged in the vision for the site allocation where it sets out that some residential development may be needed to support the restoration of the listed buildings; this should be limited to the minimum necessary to achieve viability. Residential uses should complement the existing character of the island as well as maintain and where possible improve the appearance; they should not prejudice the continued operation of existing uses relating to the river.

Any development proposal involving a vehicular river crossing would involve wider transport and engineering consideration by the Council. The construction of any river crossing will

need to be approved by the Council's Structures Engineer. The applicant will need to submit an approval in principle (AIP) from their own Structures Engineer for assessment by the Council. Therefore, any development proposal would involve the Council working with internal colleagues in transport and engineering, along with the Environment Agency, to ensure suitable access and egress is incorporated.

The Council considers that the site allocation and the policies in the Plan, when read as a whole, provide a sufficient framework to assess the site allocation, including the safe access and egress from the island and promote the achievement of the sustainable development objectives.

***Question 4.5 Is wording of the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?***

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Hampton & Hampton Hill and Site Allocations policies (Chapter 6) are considered to be clearly defined and unambiguous so that it is evident how a decision-maker should react to development proposals.

Table of Modifications – Place Based Strategy – Hampton and Hampton Hill

Details taken from the Schedule of Proposed Modifications suggested by the Council (May 2024) (LBR-002).

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
				<b>Site Allocation 2 Platts Eyot, Hampton</b>
SA2.1	n/a	34	Site Allocation 2 Platts Eyot, 'Proposed Site' at beginning/top of Context box	Clarify the full site address at beginning/top of box: Platts Eyot, <b>Lower Sunbury Road</b> , Hampton, <b>TW12 2HF</b>
SA2.2	Solve Planning, Port Hampton Estates Limited (comment 122)	34	Site Allocation 2 Platts Eyot, 'Existing Land Uses' section in Context box	Amend the text to clarify the existing land uses in the context: Business and employment uses including river-related and river-dependent operations, workshops (Use Class B2/B8), office (Class E(g)), <b>and</b> recording studios (Sui Generis) <b>and dwelling (C2)</b> ; carpark
				<b>Site Allocation 4 Car Park for Sainsburys, Hampton</b>
SA4.1	Transport for London (TfL) comment 128)	42	Site Allocation 4 Carpark for Sainsburys, Uxbridge Road, 5 <sup>th</sup> bullet point	<i>[See also Statement of Common Ground with TfL (signed 28/02/2024) (SOCG-03)]</i> Amend the reference to parking in the vision to ensure consistency with London Plan Policy T6: Parking provision <b>to London Plan standards</b> is expected to be provided including re-provision for the adjacent supermarket <b>in line with London Plan standards</b> .



**LONDON BOROUGH OF RICHMOND UPON THAMES**  
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**Main Matter 5 – Place Based Strategies and Site Allocations**  
**Teddington and Hampton Wick (Site Allocations 6 - 9)**

**WEDNESDAY 26 JUNE 2024**

**COUNCIL RESPONSES TO MAIN MATTER 5**

Document version: 06/06/2024

**Question 5.1 Is the area strategy and are the site allocation policies justified by appropriate available evidence, having regard to national guidance and local context; and are they in ‘general conformity’ with the LP?**

The Area Strategies in the Local Plan have been developed using a consistent approach having regard to national guidance, the London Plan and the local context. Rather than repeating this across each of the Main Matters 4-12, for the sake of brevity the Council's response is set out once, in an overarching document for Main Matters 4-12: Place-based strategies. Each of the Main Matter Statements in relation to each individual area strategy and site allocation policies will therefore only cover matters of relevance to that place.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Teddington and Hampton Wick and Site Allocations (Chapter 7) are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

**Question 5.2 Do the housing site allocations show how they will contribute to the achievement of the RLP's overall housing requirement over the plan period and the timescale for delivery?**

Please refer to the overarching document on the Place-Based Strategies containing the Council's overall response to housing delivery and the site allocations. These are the Site Allocations in this area which have the potential to contribute to housing delivery as follows:

Site Allocation 6: Telephone Exchange, Teddington – the Site Allocation suggests delivery could come forward in the medium to long term, with a residential element. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory in years one to five (2023/24 to 2027/28).

Site Allocation 7: Teddington Delivery Office – the Site Allocation suggests delivery could come forward in the medium to long term, with a residential element. The size of the site suggests it may be brought forward as a small site. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.

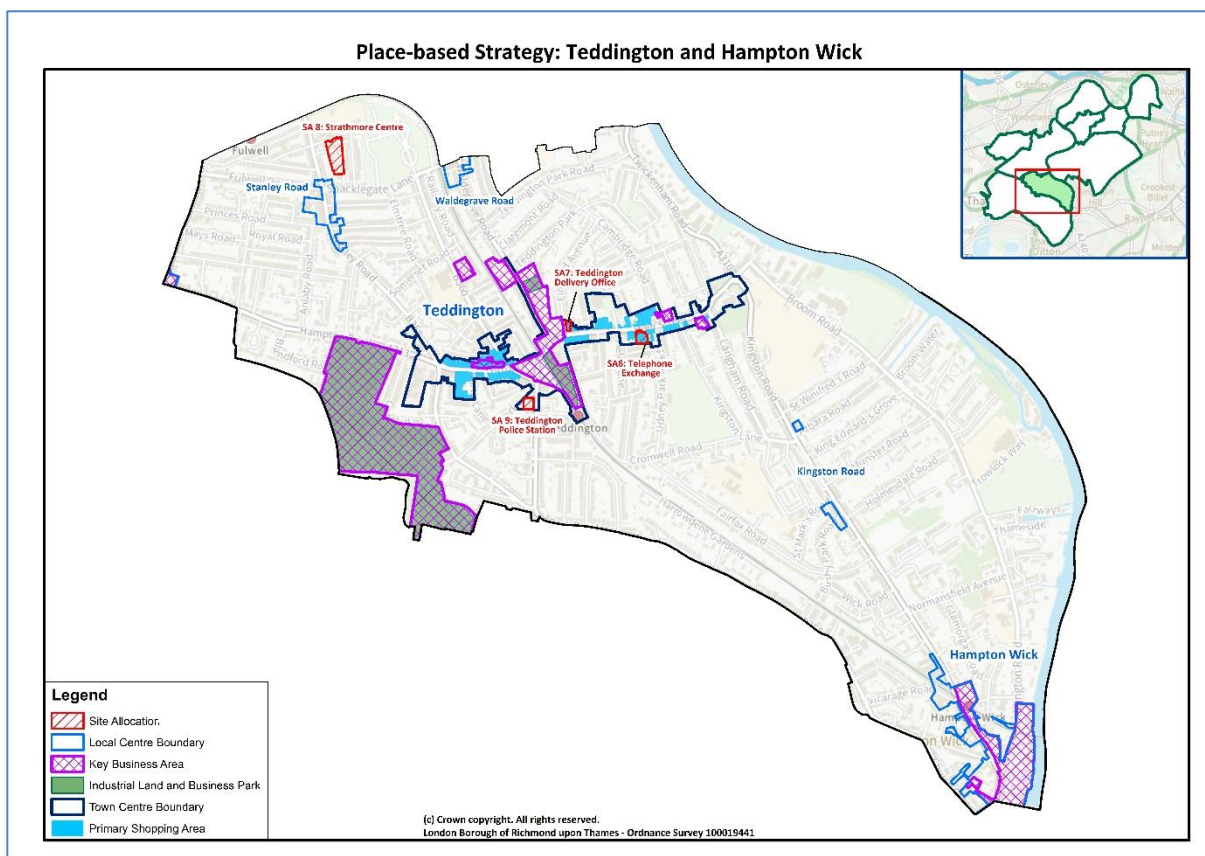
Site Allocation 8: Strathmore Centre – the Site Allocation suggests delivery could come forward in the short term, with affordable housing. Following approval of 20/0539/FUL for 30

affordable housing units, construction has started on site. The Housing AMR 2022/23 (SD-079) trajectory expects the site could deliver 30 units in year two (2024/25).

Site Allocation 9: Teddington Police Station –the Site Allocation suggests delivery could come forward in the short to medium term, with a residential element. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.

**Question 5.3 Is it clear how the expectations for employment, commercial, retail, social and community infrastructure will contribute to an evidenced need?**

Please refer to the overarching document on the Place-Based Strategies containing the Council’s response to this question.



Teddington, the largest of the centres in this area is classified as a town centre in the borough centre hierarchy (set out in Policy 17) and a district centre in the Mayor’s Town Centre Network (Annex 1 of the London Plan). Hampton Wick, Stanley Road and Kingston Road are classed as neighbourhood centres and Waldegrave Road as an Important Local Parade. More information and analysis, including review of the borough’s centre hierarchy

can be found in the Assessment of Borough Centres (SD-065). It is noted that in Table 2a of the Summary document to SD-065, Waldegrave Road parade and Kingston Road centre are identified as serving a gap in provision and communities living in an area with poor public transport accessibility. Teddington is also identified as being particularly important in meeting local need.

The map above also shows the location of the Key Business Areas in the Teddington area. These are focused on Hampton Wick and Teddington centres and Waldegrave Road, as well as the National Physical Laboratory (NPL). There are sites with Locally Important Industrial Land and Business Park (LIILBP) designations at 50-56 Waldegrave Road, Teddington Business Park and the NPL and Laboratory of the Government Chemist (LGC). The area is home to the significant assets in the science and life sciences sector and the NPL/LGC are designated as such in the RLP.

Teddington & Hampton Wick hosts a range of social and community infrastructure uses including Teddington Pool & Fitness Centre, Teddington Sports Centre, Teddington Library, Teddington Health and Social Care Centre/Teddington Memorial Hospital, Elleray Hall, Landmark Arts Centre, and the former Teddington Police Station (Site Allocation 9). There are several educational uses within the area including Teddington School and Collis Primary School. In April 2022, planning permission was granted (20/0539/FUL) for the Strathmore Centre site (Site Allocation 8) for the reprovision of the existing nursery and construction of 30 dwellings (100% affordable).

### Representations

The National Physical Laboratory (Rep No. 132) raise the contribution their employees and site, as a scientific asset, contribute to Teddington, although recruiting and retaining employees is linked to public transport availability and affordable housing. The Council's response notes that improvements to public transport and promotion of active travel is a central tenet of the Local Plan, as is the provision of housing, including affordable housing.

The Royal Parks commented (Rep No. 133) that future development plans should include reference to the protection of open space, to reflect the risk of increased recreational pressure. The Council's response outlines that the place-based strategy requires development to protect, improve and increase open spaces, recognising the importance of Bushy Park to the 'Place'. In response to the Royal Parks' comments on the Pre-Publication Regulation 18 Plan (Rep Nos. 301 and 302) an additional reference was added to the place-based strategy text to protect open space and reference the recreational pressures.

A number of comments were received from local residents advocating the removal of the Teddington (Railway Side) Zone site (Rep Noss 134 to 177 inclusive and 505). Please see the Council's response to MM18 question 18.6.

Site Allocations: What is expected to be delivered?

Site Allocations located in this area are shown on the map above and considered below.

A number of comments were received during the Local Plan (Publication) Regulation 19 consultation on the following site allocations. For ease, where modifications are agreed, these have been included within the schedule of modification table located at the end of this statement.

- Site Allocation 6 – Telephone Exchange, Teddington

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 7 – Teddington Delivery Office, Teddington

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 8 – Strathmore Centre, Strathmore Road, Teddington

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 9 – Teddington Police Station, Teddington

A member of the public (Roger Byatt, Rep No. 181) raises that priority should be given to building as a relocation site for the Park Road Surgery. The Council's response was to note that the site allocation already makes clear that a community/social infrastructure use would be considered acceptable. This could include a medical/health use, though it would not be appropriate for planning to policy to specify occupation by a particular GP practice.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

***Question 5.4 Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?***

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Teddington & Hampton Wick and Site Allocations policies (Chapter 7) are considered to be clearly defined and unambiguous so that it is evident how a decision-maker should react to development proposals.

Table of Modifications – Place Based Strategy – Teddington and Hampton Wick

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
<b>Further Proposed Modifications</b>				
				<b>Site Allocation 9 Teddington Police Station</b>
FP.4	n/a	60	Site Allocation 9 Teddington Police Station	To update terminology in the Plan. In section entitled Vision – Amend second bullet point as follows:  The site is within Teddington Town Centre but does not form part of the <b>key Primary sShopping Aarea</b> .
FP.5	n/a	58	Site Allocation 9 Teddington Police Station	To update terminology in Plan. In context box, fourth column, amend as follows:  Teddington <b>main town</b> centre boundary

**LONDON BOROUGH OF RICHMOND UPON THAMES**  
**LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC**  
**WRITTEN STATEMENT**

**Main Matter 6 – Place Based Strategies and Site Allocations**  
**Twickenham, Strawberry Hill and St Margarets**  
**(Site Allocations 10 - 19)**

**THURSDAY 27 JUNE 2024**

**COUNCIL RESPONSES TO MAIN MATTER 6**

Document version: 06/06/2024



***Question 6.1 Is the area strategy and are the site allocation policies justified by appropriate available evidence, having regard to national guidance and local context; and are they in ‘general conformity’ with the LP?***

The Area Strategies in the Local Plan have been developed using a consistent approach having regard to national guidance, the London Plan and the local context. Rather than repeating this across each of the Main Matters 4-12, for the sake of brevity the Council's response is set out once, in an overarching document for Main Matters 4-12: Place-based strategies. Each of the Main Matter Statements in relation to each individual area strategy and site allocation policies will therefore only cover matters of relevance to that place.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Twickenham, Strawberry Hill & St Margarets and Site Allocations (Chapter 8) are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

***Question 6.2 Do the housing site allocations show how they will contribute to the achievement of the RLP's overall housing requirement over the plan period and the timescale for delivery?***

Please refer to the overarching document on the Place-Based Strategies containing the Council's overall response to housing delivery and the site allocations. These are the Site Allocations in this area which have the potential to contribute to housing delivery as follows:

Site Allocation 10: St Mary's University – the Site Allocation suggests delivery could come forward in the short, medium or long term, and could include student residential accommodation. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.

Site Allocation 11: Richmond upon Thames College – the Site Allocation suggests delivery could come forward in the short to medium term, as part of a large, phased redevelopment. For the residential element, following approval of 22/1168/FUL for 212 homes, construction has now started on site. The Housing AMR 2022/23 (SD-079) trajectory expects the site could deliver 212 units within years one to five (2025/26).

Site Allocation 12: The Stoop (Harlequins Rugby Football Club) – the Site Allocation suggests delivery could come forward in the short, medium or long term, and could include

an element of residential use provided it is compatible with the main use of the site. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.

Site Allocation 13: Twickenham Stadium – the Site Allocation suggests delivery could come forward in the short, medium or long term, and could include an element of residential use provided it is compatible with the main use of the site. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.

Site Allocation 14: Mereway Day Centre – the Site Allocation suggests delivery could come forward in the short term, as a residential-led scheme. The size of the site suggests it may be brought forward as a small site. A suggested modification (SA14.1 in LBR-002 and in the extract of relevant modifications below) updates the planning history to reflect permission was granted 23/0260/FUL for 7 affordable housing units. The Housing AMR 2022/23 (SD-079) trajectory expects the site could deliver 7 units in year three (2025/26).

Site Allocation 15: Station Yard – the Site Allocation suggests delivery could come forward in the short term, as a residential scheme. Following approval of 19/3616/FUL for 46 units, construction has now started on site. The Housing AMR 2022/23 (SD-079) trajectory expects the site could deliver 46 units within years one to five (2025/26 to 2026/27).

Site Allocation 16: Twickenham Telephone Exchange – the Site Allocation suggests delivery could come forward in the medium to long term, with a residential element. The Housing AMR 2022/23 (SD-079) trajectory expects the site could deliver 20 units within later years one to five (2026/27 to 2027/28).

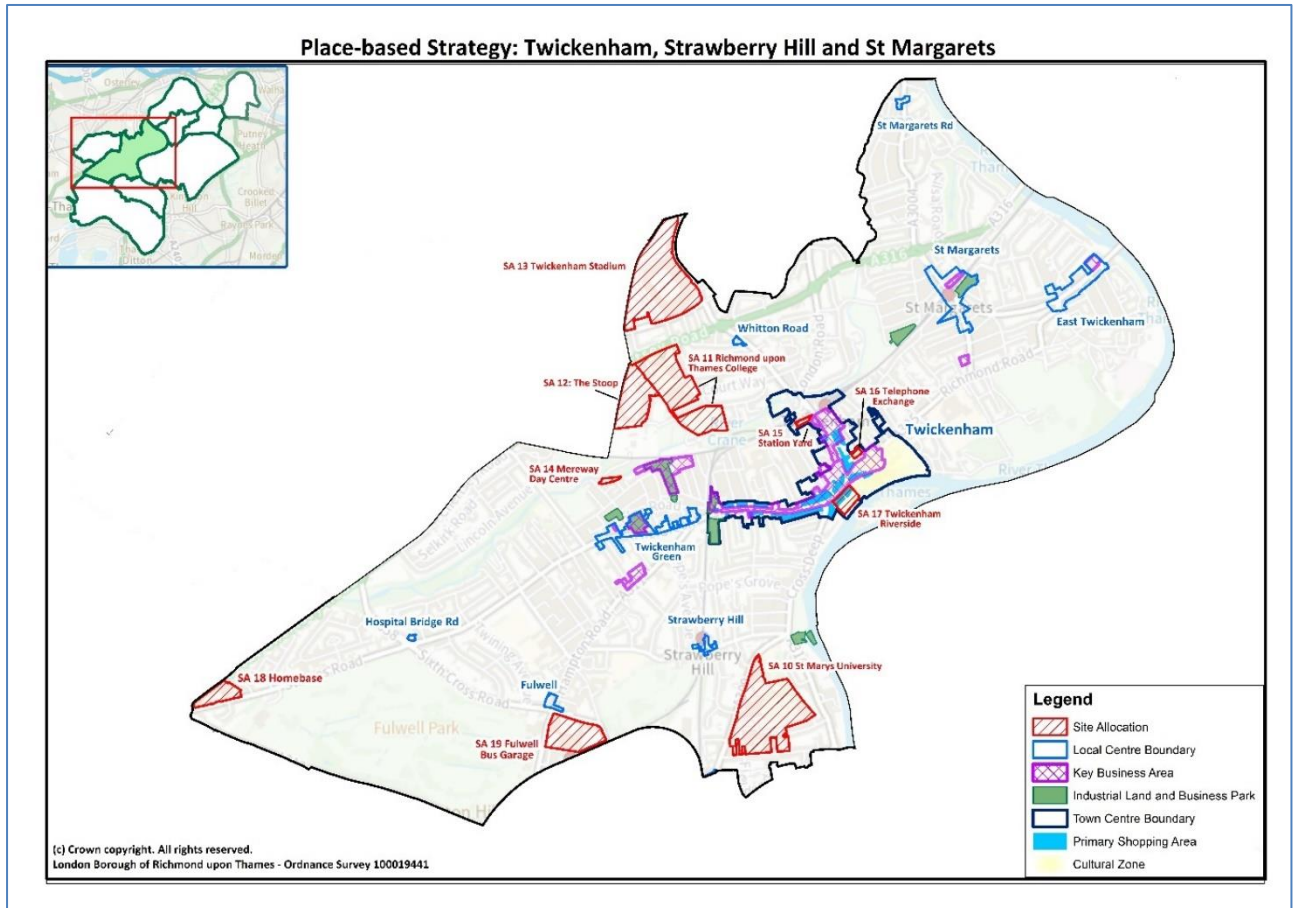
Site Allocation 17: Twickenham Riverside and Water Lane/King Street - the Site Allocation suggests delivery could come forward in the short term, including a residential element. Following approval of 21/2758/FUL for 45 units, a compulsory purchase order (CPO) was confirmed at the end of 2023. The Housing AMR 2022/23 (SD-079) trajectory expects the site could deliver 45 units within years one to five (2023/24 to 2026/27).

Site Allocation 18: Homebase, Twickenham Road – the Site Allocation suggests delivery could come forward in the medium to long term, with a large residential-led redevelopment. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.

Site Allocation 19: Fulwell Bus Garage – the Site Allocation suggests delivery could come forward in the medium to long term, with a residential element. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.

**Question 6.3 Is it clear how the expectations for employment, commercial, retail, social and community infrastructure will contribute to an evidenced need?**

Please refer to the overarching document on the Place-Based Strategies containing the Council’s response to this question.



Twickenham, the largest of the centres in this area is classified as a town centre in the borough centre hierarchy (set out in Policy 17) and a district centre in the Mayor’s Town Centre Network (Annex 1 of the London Plan). East Twickenham and St Margarets are classified as local centres. Twickenham Green is promoted to a neighbourhood centre following review of the hierarchy, and Hospital Bridge Road, Fulwell (Hampton Road), Strawberry Hill and Whitton Road are classified as Important Local Parades. St Margaret’s Road parade to the very north of this strategy area is also recognised as partly serving residents which are relatively disadvantaged in Isleworth to the north, and where there is poor public transport accessibility and is serving communities living in an identified gap in provision.

More information and analysis, including review of the borough's centre hierarchy, including the methodology and assessment criteria for review, can be found in the Assessment of Borough Centres (SD-065).

It is noted that in Table 2a of the Summary document to SD-065, Hospital Bridge Road parade is identified as clearly serving residents which are relatively disadvantaged, where there is poor public transport accessibility and is serving communities living in an identified gap in provision. Fulwell contributes to serving a small gap in provision to the northwest, partly serves an area to the west which is relatively disadvantaged and part of area it serves has low public transport accessibility.

The map above also shows the location of the Key Business Areas (KBA) which are mainly focused on Twickenham and St Margarets. There are Locally Important Industrial Land and Business Parks (LILBP) at Twickenham Film Studios and St Margarets Business Centre in St Margarets, and a number of industrial estates around Twickenham (Heathlands Industrial Estate, St George's Industrial Estate, Mereway Road Industrial Estate, Swan Island Industrial Estate and Electroline House and surrounds). The West Twickenham Cluster is also designated as both KBA/LILBP and is the site of the former Gregg's Bakery that was subject of a recent planning application for residential-led development (resolved to approve by Planning Committee on 15 November 2023 – see the Council's response to Main Matter 15).

Social and community infrastructure uses within the Twickenham, Strawberry Hill and St Margarets areas include Marble Hill, Orleans House Gallery, Crane and ETNA community centres. The proposed Twickenham Cultural Quarter (see map above, and the Council's response to Main Matter 14) contains a concentration of social and community infrastructure uses including the Civic Centre, York House and Gardens, the Mary Wallace Theatre, Twickenham Museum and Library, and several drinking establishments. Twickenham Stadium (Site Allocation 13) and The Stoop (Harlequins Rugby Football Club) (Site Allocation 12) are major sports facilities in the area, complimented by a number of golf courses, gyms and fitness clubs. Educational uses within the area include Richmond upon Thames College (Site Allocation 11), St Mary's University (Site Allocation 10), Deer Park School, East Twickenham and special schools at Capella House and Strathmore (co-located with St Richard Reynolds).

### Representations

A member of the public (Graham Martin, Rep No. 183) raised a concern about the reference to a new pedestrian and cycle bridge to Orleans Road and the suitability of its location, and suggests that Radnor Gardens would be a more suitable location. The Council's response

was to note that initial feasibility studies have been carried out and Ham to Twickenham has been identified as the most suitable location. No concerns have been raised by TfL.

The Rugby Football Union (Rep No. 184) commented to support the reference added to the UDS (SD-052) about the Stadium area.

The owner of Arlington Works commented (Rep No. 185) that the site should be allocated for mixed-use development. The Council is proposing to continue to safeguard the existing waste site on the grounds that its removal would be significantly harmful to London's strategic approach to the management of waste and would conflict with Policies SI 8 and SI 9 of the London Plan, see further the Council's response to Main Matter 13.

Network Rail (Southern) commented (Rep. No 186) that the place-based strategy and site allocations should promote improved access to the rail network and reference developer contributions. The promotion of active travel is referenced as a policy aspiration for the place-based strategy. In addition, paragraph 23.23 of the supporting text to Policy 47 refers to the need to improve quality and connectivity of transport interchanges, referring to transport schemes set out in the IDP. Planning obligations to secure funding would be dealt with at planning stage, where they meet the relevant tests of the NPPF.

Transport Trading Limited Properties' representation (Rep No. 187) supported the recognition that the area is an appropriate location for growth, noting that TfL has two significant landholdings in this area.

#### Site Allocations: What is expected to be delivered?

Site Allocations located in this area are shown on the map above and considered below.

A number of comments were received during the Local Plan (Publication) Regulation 19 consultation on the following site allocations. For ease, where modifications are agreed, these have been included within the schedule of modification table located at the end of this statement.

- Site Allocation 10 – St Mary's University, Strawberry Hill

See the Council's response in the Overarching Statement for place-based strategies to question 4-12.1 with regards to Historic England's representation (Rep No. 188).

CPRE London raised concern that proposals for the site are likely to involve inappropriate development on MOL. This was a resubmission of a comment on the (Pre-Publication) Regulation 18 Local Plan. An amendment was made to the reference to the MOL and it is considered that this accords with Policy 35.

Sport England commented to support the retention or replacement of playing fields and facilities.

Strawberry Hill Residents' Association (Rep No. 192) raised whether the allocation reflects the aspirations of St Mary's University. St Mary's University have commented on the Plan separately at both Regulation 18 and 19 stages and have not advised that their intentions for the site have significantly changed.

St Mary's University's representation (Rep No. 193) welcomed the site allocation, but that the Teddington Lock campus should be a separate site allocation, or that further emphasis should be given to the vision to enhance the indoor and outdoor sport and recreational use and associated ancillary educational facilities. The allocation as it stands does not preclude the Teddington Lock site from coming forward for development as part of an overall strategy (and being assessed against the Development Plan), though it does ensure that any partial redevelopment does not preclude the overall objectives of the site allocation from being met. It is therefore not considered that the creation of a separate site allocation is either necessary or appropriate.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 11 – Richmond upon Thames College, Twickenham

Sport England support (Rep No. 195) the reference to protect and upgrade the playing field.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 12 – The Stoop (Harlequins Rugby Football Club), Twickenham

CPRE London commented (Rep No. 196) that any redevelopment should improve accessibility of the path next to the Duke of Northumberland River. The text for the 'vision' for the allocation does already include that any development proposal is required to protect, and where possible enhance, the River Crane corridor and Duke of Northumberland River.

TfL commented (Rep No. 197) to note the reference to close working with TfL.

Sport England's representation (Rep No. 199) raised that it should be clearer in the vision that development proposals should not impact on the stadium area. The text for the site allocation vision already makes clear support for the continued use of the site as a sporting venue, and that development must be complementary to this use.

Surrey County Council's comment (Rep No 200) raised the implications of the allocation on the continued operation of the existing Depot, which is a safeguarded waste site. The reformatted site allocation format means that the adjacent Depot, and that it is a safeguarded waste site, is mentioned in the 'Context' section.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 13 – Twickenham Stadium, Twickenham

TfL responded (Rep No. 201) to seek reference in the vision to be consistent with the London Plan standards for coach parking and servicing facilities. A modification (SA13.2 in LBR-002) has been agreed with TfL in the Statement of Common Ground (SOC-03) to amend the reference to parking in the vision to ensure consistency with London Plan Policy T6.

Sport England commented (Rep No. 203) to seek a clear reference that proposals should not impact on the stadium area. The text for the vision for the allocation already does make clear support for the continued use of the site as a sporting venue, and that any development must be complementary to this use.

The Rugby Football Union's representation (Rep No. 204) supports the allocation but commented that there should be specific reference to an entertainment use in the main description of an acceptable land use, as this is an important function, and that the site should be referred to as a sports 'venue' rather than a sports 'ground'. The Council's response was that inclusion of 'entertainment' as an acceptable primary land use risks diluting the primary sporting function of the site, though the wording of the allocation was amended following the RFU's similar comments to the (Pre-Publication Regulation 18 consultation (Rep No. 522) to acknowledge 'entertainment' as a secondary use. Please note Sport England's comments above regarding protection of the sporting capacity including the pitch. The description of the site as a 'sports ground' is considered to be a more appropriate description. Please also see the Council's response to MM14 question 14.1 regarding the representation (Rep No. 464) to remove a strip of land designated as MOL.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 14 – Mereway Day Centre, Mereway Road, Twickenham

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 15 – Station Yard, Twickenham

TfL noted (Rep No. 206) the reference to adequate standing capacity and drivers' facilities.

Network Rail (Southern) (Rep No. 208) commented to support the allocation.

Transport Trading Limited Properties' representation (Rep No. 209) welcomed the allocation, which includes the TfL landholding, and commented that this has ongoing operational requirements on event days, as recognised in the allocation.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 16 – Twickenham Telephone Exchange

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 17 – Twickenham Riverside and Water Lane/King Street

TfL's comment (Rep No. 212) welcomed the clarification on parking.

The Environment Agency's representation (Rep No. 213) supported the clarification on flooding.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

Since submission to the Planning Inspector of the (Publication) Regulation 19 Local Plan, the decision to approve planning permission on the site (application ref. 21/2758/FUL) has now been issued.<sup>1</sup>

- Site Allocation 18 – Homebase, Twickenham Road, Hanworth

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 19 – Fulwell Bus Garage, Wellington Road, Twickenham

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<sup>1</sup> [https://www2.richmond.gov.uk/plandata2/Planning\\_CaseNo.aspx?strCASENO=21/2758/FUL](https://www2.richmond.gov.uk/plandata2/Planning_CaseNo.aspx?strCASENO=21/2758/FUL)



TfL commented (Rep No. 216) to support the requirement to retain the bus garage use.

Network Rail (Southern) commented (Rep No. 218) to support the allocation, but suggested that reference be made to the need to improve station access and the securing of developer contributions. Please see the Council's response above on this matter in the 'Representations' section on the place-based strategy.

The London Borough of Hounslow's representation (Rep No. 219) noted the reference to retention and safeguarding of the bus garage operation, and urges LBRuT to work with TfL and bus operators, should a development come forward, to ensure no interruption and cross-boundary impacts.

Transport Trading Limited Properties recognised (Rep No. 220) the requirement to retain the bus garage use, but raised that the site allocation should clarify that it is expected that a residential-led development would come forward, and that properties on Wellington Gardens should be included in the boundary to enable access to be improved and facilitate place-making, together with the suggestion that reference should be made in the text to the UDS (SD-052) and the opportunity to create landmark taller buildings. The Council's response was that the policy wording is intended to outline the importance of retention/reprovision of social infrastructure uses, as per RLP Policy 46, whilst also acknowledging the housing potential of the site. The allocation is worded as such so as to allow some flexibility as to how the aspirations set out in the vision are to be delivered, noting too that there is no evidence that the Council is aware of that the ambulance and fire service uses on site are surplus to requirements. Further, the allocations boundary does not preclude a planning application from coming forward which incorporates land outside of the boundary. Furthermore, the text already references the requirement to have regard to the UDS (SD-052).

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

***Question 6.4 Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?***

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Twickenham, Strawberry Hill & St Margarets and Site Allocations policies (Chapter 8) are considered to be clearly defined and

unambiguous so that it is evident how a decision-maker should react to development proposals.

Table of Modifications – Place Based Strategy – Twickenham, Strawberry Hill and St Margarets

Details taken from the Schedule of Proposed Modifications suggested by the Council (May 2024) (LBR-002).

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
<b>Site Allocation 10 St Mary’s University, Strawberry Hill</b>				
SA10.1	Historic England (comment 188)	66	Site Allocation 10 St Mary’s University, Strawberry Hill, ‘Heritage Assets’ section in Context box	<i>[See also Statement of Common Ground with Historic England (to be confirmed once signed)]</i> Correct factual error (Grade II not Grade I):  St Mary’s College Chapel, Waldegrave Road (Grade II)
<b>Site Allocation 13 Twickenham Stadium, Twickenham</b>				
SA13.1	n/a	77	Site Allocation 13 Twickenham Stadium, Twickenham, 5 <sup>th</sup> bullet point	Typo correction:  The submission of an odour impact assessment would be requireds upfront.
SA13.2	Transport for London (TfL) (comment 201)	77	Site Allocation 13 Twickenham Stadium, Twickenham, 6 <sup>th</sup> bullet point	<i>[See also Statement of Common Ground with TfL (signed 28/02/2024) (SOCG-03)]</i> Amend the reference to parking in the vision to ensure consistency with London Plan Policy T6:  ‘There is a need to retain Parking provision particularly for coaches, servicing facilities and space for spectators and related services, should be in line with London Plan standards and should include coach parking and servicing facilities.’

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
				<b>Site Allocation 14 Mereway Day Centre, Twickenham</b>
SA14.1	n/a	80	Site Allocation 14 Mereway Day Centre, Twickenham, 2 <sup>nd</sup> bullet point of 'Relevant Planning History' in 'Context' box	Update the planning history: <ul style="list-style-type: none"> <li>An application <del>has been submitted and is awaiting validation</del> for a residential development and associated car parking <u>was granted planning permission 01/02/2024 (ref, 23/0260/FUL)</u>.</li> </ul>
				<b>Site Allocation 16: Twickenham Telephone Exchange</b>
FP.6	n/a	85	Site Allocation 16 Twickenham Telephone Exchange	To update terminology in Plan. In context box, fourth column, amend as follows: Twickenham <u>main town</u> centre boundary
FP.7	n/a	86	Site Allocation 16 Twickenham Telephone Exchange	To update terminology in Plan. In context box, second column, amend as follows: <ul style="list-style-type: none"> <li><u>Main Town</u> Centre Boundary Buffer Zone</li> </ul>
				<b>Site Allocation 17: Twickenham Riverside and Water Lane/ King Street</b>
FP.8	n/a	88	Site Allocation 17 Twickenham Riverside and Water Lane/King Street	To update terminology in Plan. In context box, fourth column, amend as follows: Twickenham <u>main town</u> centre boundary
FP.9	n/a	89	Site Allocation 17 Twickenham Riverside and Water Lane/King Street	To update terminology in Plan. In context box, second column, make following change: <u>Main Town</u> Centre Boundary Buffer Zone
FP.10	n/a	90	Site Allocation 17 Twickenham Riverside and Water Lane/King Street	To update terminology in Plan. Second sentence of second bullet point of Vision: Retail should be maintained at ground-floor <del>in</del> the existing <u>Primary Shopping Area retail frontage</u> of King Street.
				<b>Site Allocation 18 Homebase, Twickenham Road, Hanworth</b>

FP.11	n/a	94	Site Allocation 18 Homebase, Twickenham Rd, Hanworth	To update terminology in the Plan. In section entitled Vision - Amend first sentence of third bullet point as follows: As the site is located outside of a town centre <b>and defined Primary Shopping Area and defined retail frontage</b> , the existing retail use is not protected.
<b>Site Allocation 19 Fulwell Bus Garage, Twickenham</b>				
SA15.1	n/a	97	Site Allocation 19 Fulwell Bus Garage 3 <sup>rd</sup> bullet point	Remove erroneous bracket:  There is a need for housing in the borough and this site is suitable for a substantial provision of new housing units, including a policy compliant level of affordable housing).
FP.12	n/a	97	Site Allocation 19 Fulwell Bus Garage 3 <sup>rd</sup> bullet point	To update terminology in the Plan. In section entitled Vision - Amend first sentence of third bullet point as follows: <del>As the site is located outside of a town centre <b>and defined Primary Shopping Area and defined retail frontage</b>, the existing retail use is not protected.</del>

**LONDON BOROUGH OF RICHMOND UPON THAMES**  
**LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC**  
**WRITTEN STATEMENT**

**Main Matter 7 – Place Based Strategies and Site Allocations**

**Whitton and Heathfield**

**(Site Allocations 20 - 22)**

**THURSDAY 27 JUNE 2024**

**COUNCIL RESPONSES TO MAIN MATTER 7**

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Document version: 06/06/2024

**Question 7.1 Is the area strategy and are the site allocation policies justified by appropriate available evidence, having regard to national guidance and local context; and are they in ‘general conformity’ with the LP?**

The Area Strategies in the Local Plan have been developed using a consistent approach having regard to national guidance, the London Plan and the local context. Rather than repeating this across each of the Main Matters 4-12, for the sake of brevity the Council’s response is set out once, in an overarching document for Main Matters 4-12: Place-based strategies. Each of the Main Matter Statements in relation to each individual area strategy and site allocation policies will therefore only cover matters of relevance to that place.

Please refer to the Council’s response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Whitton & Heathfield and Site Allocations (Chapter 9) are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

**Question 7.2 Do the housing site allocations show how they will contribute to the achievement of the RLP’s overall housing requirement over the plan period and the timescale for delivery?**

Please refer to the overarching document on the Place-Based Strategies containing the Council’s overall response to housing delivery and the site allocations. These are the Site Allocations in this area which have the potential to contribute to housing delivery as follows:

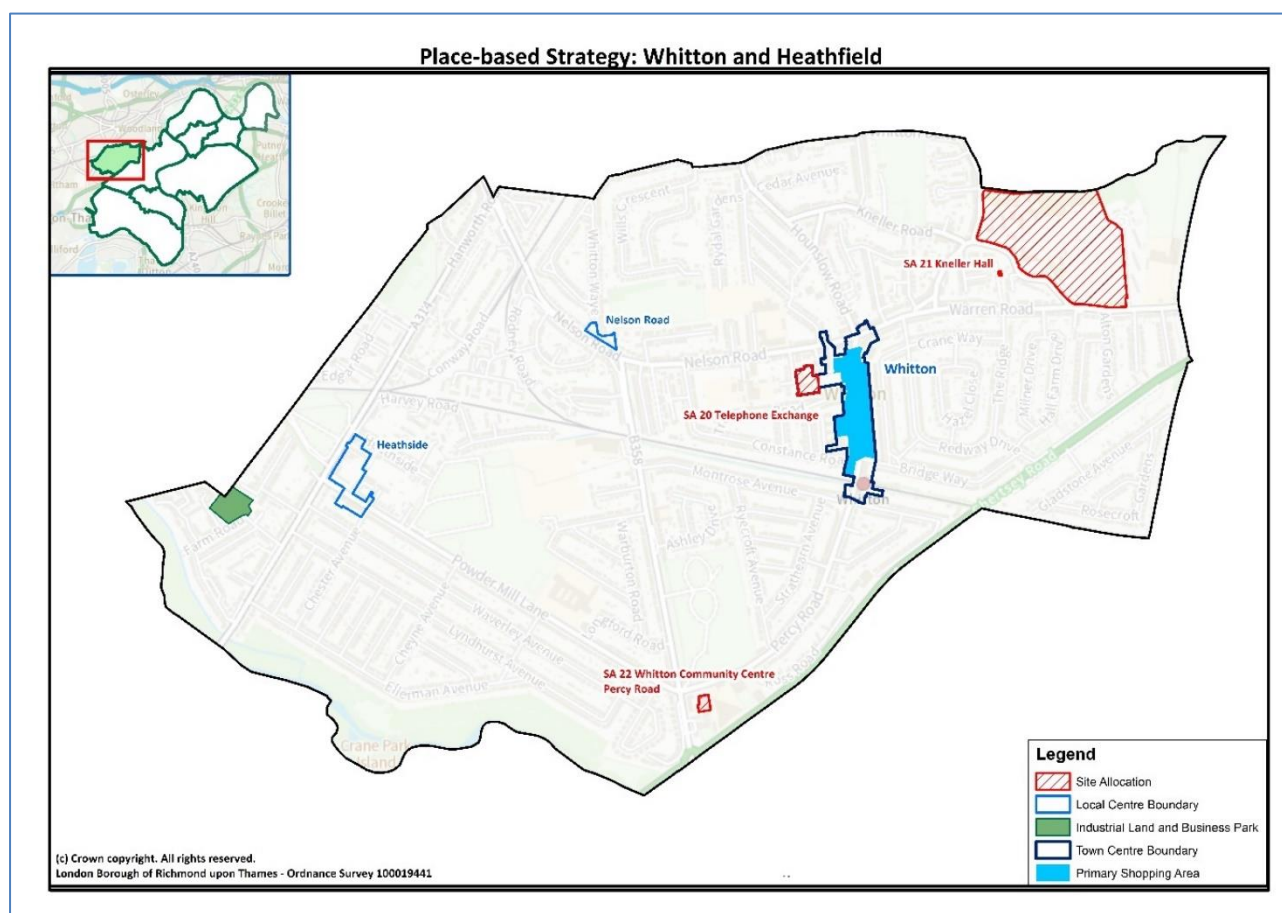
Site Allocation 20: Telephone Exchange, Ashdale Close, Whitton – the Site Allocation suggests delivery could come forward in the medium to long term, with a residential element. The Housing AMR 2022/23 (SD-079) trajectory expects the site could deliver 20 units within later years one to five (2026/27 to 2027/28).

Site Allocation 22: Whitton Community Centre, Percy Road, Whitton – the Site Allocation suggests delivery could come forward in the short to medium term, with affordable housing. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.

There is no housing delivery expected from Site Allocation 21: Kneller Hall.

**Question 7.3 Is it clear how the expectations for employment, commercial, retail, social and community infrastructure will contribute to an evidenced need?**

Please refer to the overarching document on the Place-Based Strategies containing the Council's response to this question.



Whitton, the largest of the centres in this area, is classified as a town centre in the borough centre hierarchy (set out in Policy 17) and a district centre in the Mayor's Town Centre Network (Annex 1 of the London Plan). Heathside (Powder Mill Lane) is designated as a neighbourhood centre and Nelson Road as an Important Local Parade. More information and analysis, including review of the borough's centre hierarchy can be found in the Assessment of Borough Centres (SD-065).

It is noted that in Table 2a of the Summary document to SD-065, Heathside (Powder Mill Lane) neighbourhood centre and Nelson Road parade are both identified as clearly serving residents which are relatively disadvantaged, where there is poor public transport



accessibility and is serving communities living in an identified gap in provision. Whitton town centre is also identified as being particularly important in meeting local need.

The map also shows the location of Mill Farm Locally Important Industrial Land and Business Park. There are no Key Business Areas in this part of the borough.

Whitton & Heathfield hosts a range of social and community infrastructure uses including Whitton Community Centre (Site Allocation 22), Whitton Library, Whitton Park Sports Association, Murray Park, Heathfield Recreation Ground, and a small part of Hounslow Heath. There are several educational uses within the area including Twickenham School and Turing House School. A planning application (22/3004/FUL) is currently being assessed whereby Kneller Hall (Site Allocation 21) would become the Upper School for Radnor House School.

### Representations

Dukes Education Group and Radnor House School raise a comment (Rep Nos. 221) that the place-based strategy should be updated to reference their proposals for Kneller Hall, as set out in their comments on Site Allocation 21. Please see below in the 'Site Allocations' section.

### Site Allocations: What is expected to be delivered?

Site Allocations located in this area are shown on the map above and considered below.

A number of comments were received during the Local Plan (Publication) Regulation 19 consultation on the following site allocations. For ease, where modifications are agreed, these have been included within the schedule of modification table located at the end of this statement.

- Site Allocation 20 – Telephone Exchange, Whitton

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 21 – Kneller Hall, Whitton

See above regarding the comment from Dukes Education Group and Radnor House against the place-based strategy. Further to this, their comment against the site allocation (Rep No. 226 provides details of their background and proposals for the site, and raises that the allocation should be updated to reflect their client's proposals, and that as the site is not currently publicly accessible together with the fact that their proposals would improve accessibility for community groups and schools, the text should be amended to remove the

requirement to provide public green space or links through the site. The Council's justification and response to the comment is to note that the site is located in an Area Poorly Provided with Public Open Space and the requirements of LP Policy G4 and RLP Policy 37. The onus would be on the applicant to demonstrate how and why any development would not be able to provide publicly accessible open space, notwithstanding the policy requirements to improve existing provision for social cohesion and biodiversity reasons. Further, it is not considered that the provision of public access to open space automatically conflicts with a proposed school use; whilst the need for pupil safeguarding is recognised, many private schools allow public access to their grounds and sports pitched on a managed basis, and this could be weighed up and managed via a Community Use Agreement at planning application stage. The Council would further add that, whilst the advanced stage of the current planning application is noted (application ref. 22/3004/FUL), the allocation does allow for other uses other than educational, and is worded such to allow for flexibility, taking into account that it is not 100% guaranteed that any one planning application or permission will be implemented.

Sport England (Rep No. 225) have commented to support the reference to retaining, and where possible upgrading, playing fields.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 22 – Whitton Community Centre, Percy Road, Whitton

Whitton Community Association (Rep No. 222) commented against the place-based strategy that the Community Centre should be correctly referred to as a community centre, food bank and pharmacy. An additional comment (Rep No. 229) against the site allocation raises concern about the policy aims and how affordable housing will be combined with the community use, and that this does not allow a 100% affordable housing scheme. It is considered that the Site Allocation is clear that only if the currently community centre and pharmacy are adequately re-provided, can an affordable housing scheme be explored on the upper levels of any redevelopment.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

**Question 7.4 Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?**

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Whitton & Heathfield and Site Allocations policies (Chapter 9) are considered to be clearly defined and unambiguous so that it is evident how a decision-maker should react to development proposals.

Table of Modifications – Place Based Strategy – Whitton and Heathfield

Details taken from the Schedule of Proposed Modifications suggested by the Council (May 2024) (LBR-002).

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
				<b>Place-based Strategy for Whitton &amp; Heathfield</b>
PBSW&H.1	Whitton Community Association (comment 222)	100	Place-based Strategy for Whitton & Heathfield	<p>Correct to refer accurately to the existing use:</p> <p>As Whitton Community Centre (Site Allocation 22) there is an opportunity to reprovide community facilities (the existing <b>day community</b> centre and pharmacy) with affordable housing above, to provide modern facilities for the elderly and wider local community.</p>
				<b>Site Allocation 20 Telephone Exchange Ashdale Close, Whitton</b>
FP.13	n/a	101	Site Allocation 20 Telephone Exchange Ashdale Close, Whitton	<p>To update terminology in Plan. In context box, fourth column, make following change:</p> <p>Whitton <b>main town</b> centre boundary</p>
FP.14	n/a	101	Site Allocation 20 Telephone Exchange Ashdale Close, Whitton	<p>To update terminology in Plan. In Vision amend as follows:</p> <p>Second sentence: Appropriate land uses include employment and social infrastructure or other appropriate main <b>town</b> centre uses.</p> <p>Third bullet:</p> <p>Any redevelopment proposal should provide for employment and social infrastructure or other appropriate main <b>town</b> centre uses.</p> <p>Fourth bullet:</p> <p>Only if other main <b>town</b> centre uses as well as social infrastructure or community uses have been explored ....</p>
				<b>Site Allocation 21 Kneller Hall, Whitton</b>

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
SA21.1	DWD, Dukes Education Group and Radnor House School (comment 568)	105	Site Allocation 21 Kneller Hall, Whitton 2 <sup>nd</sup> bullet point of 'Access to Open Space/Nature' in 'Context' section	Update to reflect Appendix 4 which includes Kneller Hall as a new SINC: <ul style="list-style-type: none"> <li>Candidate site for designation as a Site of Important Importance for Nature Conservation (subject to Regulation 19 Local Plan consultation)</li> </ul>
SA21.2	DWD, Dukes Education Group and Radnor House School (comment 568)	105	Site Allocation 21 Kneller Hall, Whitton, 3 <sup>rd</sup> para.in 'Description of Current Site Character' in 'Context' section	Update the site description: The site includes extensive grounds designated as MOL, which include playing fields, with a significant number of protected trees. The grounds are also a designated Site of Important Nature Section, the majority of which is acid grassland, with a proportion towards the south identified as irreplicable.
SA21.3	DWD, Dukes Education Group and Radnor House School (comment 568)	106 - 107	Site Allocation 21, Kneller Hall, Whitton, 10 <sup>th</sup> bullet point in 'Vision' section	Amends for clarity to cross-reference policy context: <ul style="list-style-type: none"> <li>It is expected that the existing playing fields will be retained and where possible upgraded, such as ancillary facilities including changing facilities, to support the use of the playing fields, provided that any existing ecological benefits and the openness and character of the MOL is retained protected, and where possible enhanced. There is an expectation that any redevelopment proposal would improve the character and openness of the designated open land and protect the ecological value of the SINC in accordance with Policy 39. Development in the MOL itself would not be supported, though there may be an opportunity to consolidate and re-provide the current built footprint within the MOL in a new building, in compliance with Local Plan Policy 35 and the</li> </ul>

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
				requirements of the NPPF, subject to scale, massing and impact on character and openness.
				<b>Site Allocation 22 Whitton Community Centre, Whitton</b>
SA22.1	Joan Gibson (comment 227) and Whitton Community Association (comment 229)	109	Site Allocation 22 Whitton Community Centre, 1 <sup>st</sup> and 2 <sup>nd</sup> bullet points of 'Access to Open Space/Nature'	<p>Correction to the text:</p> <p>Twickenham Cemetery (35m Nature north of site) <del>150m west</del> – Other Open Land of Townscape Importance (OOLTI), Site of Important Nature Conservation (SINC)</p> <p><del>There is a lively and attractive local shopping centre at Kew Gardens Station... there are also local parades at Kew Green and Sandycombe Road which provide for top up shopping... the strategy for this area is to conserve the character, whilst enhancing existing features where appropriate (junction of Percy Road) (75m northwest) – OOLTI</del></p>
SA22.2	n/a	110	Site Allocation 22 Whitton Community Centre, Vision	<p>To correct a factual error, delete from the last bullet point in the Vision:</p> <p><del>The Kneller Hall SPD and accompanying Heritage Assets Assessment and</del></p>

**LONDON BOROUGH OF RICHMOND UPON THAMES**  
**LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC**  
**WRITTEN STATEMENT**

**Main Matter 8 – Place Based Strategies and Site Allocations**

**Ham, Petersham and Richmond Park**

**(Site Allocations 23 - 24)**

**THURSDAY 27 JUNE 2024**

**COUNCIL RESPONSES TO MAIN MATTER 8**

Document version: 06/06/2024

***Question 8.1 Is the area strategy and are the site allocation policies justified by appropriate available evidence, having regard to national guidance and local context; and are they in ‘general conformity’ with the LP?***

The Area Strategies in the Local Plan have been developed using a consistent approach having regard to national guidance, the London Plan and the local context. Rather than repeating this across each of the Main Matters 4-12, for the sake of brevity the Council's response is set out once, in an overarching document for Main Matters 4-12: Place-based strategies. Each of the Main Matter Statements in relation to each individual area strategy and site allocation policies will therefore only cover matters of relevance to that place.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Ham, Petersham and Richmond Park and Site Allocations (Chapter 10) are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

***Question 8.2 Do the housing site allocations show how they will contribute to the achievement of the RLP's overall housing requirement over the plan period and the timescale for delivery?***

Please refer to the overarching document on the Place-Based Strategies containing the Council's overall response to housing delivery and the site allocations. These are the Site Allocations in this area which have the potential to contribute to housing delivery as follows:

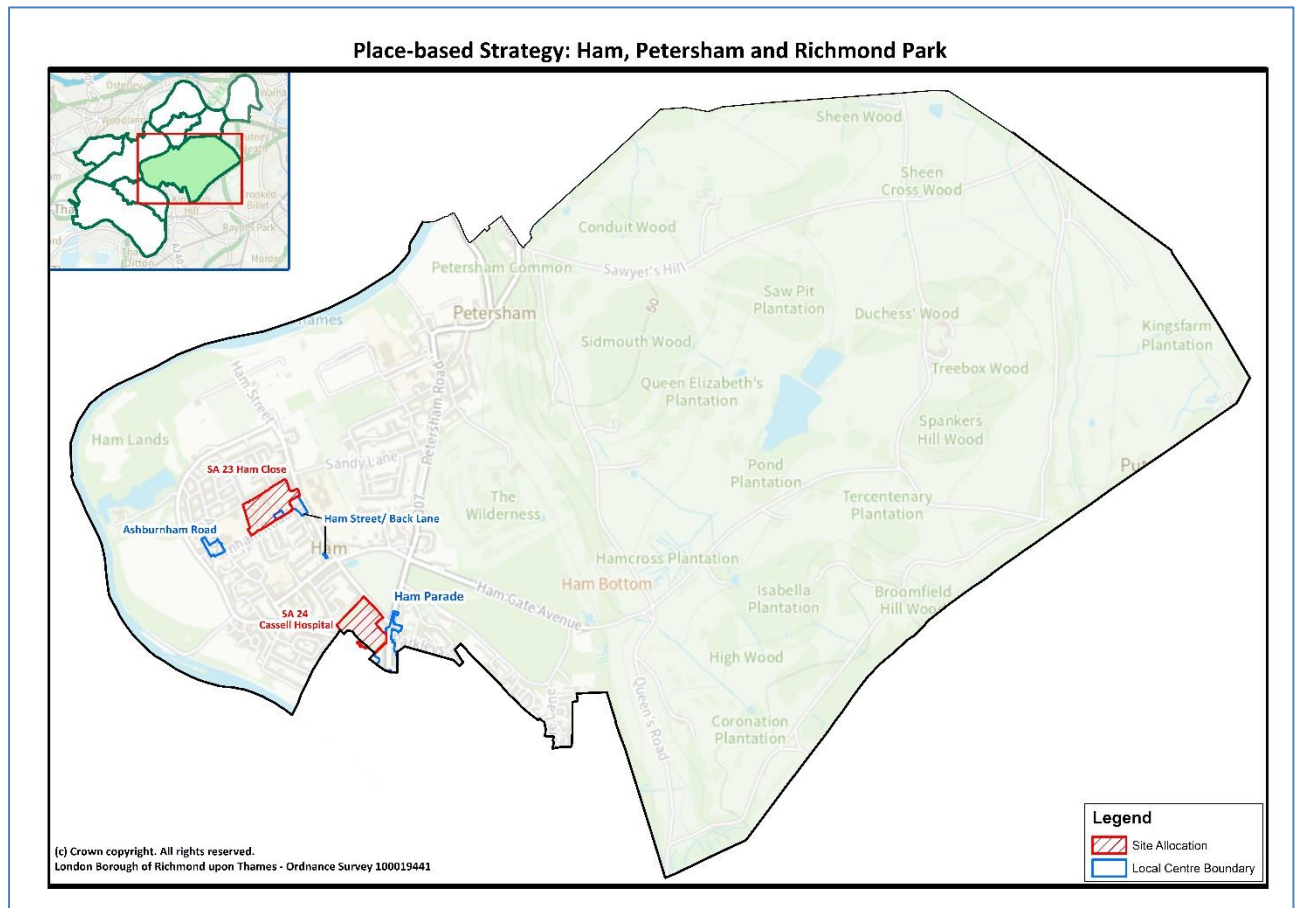
Site Allocation 23: Ham Close, Ham – the Site Allocation suggests delivery could come forward in the short to medium term, as a large scale phased residential regeneration scheme. A suggested modification (SA23.1 in LBR-002 and in the extract of relevant modifications below) updates the planning history to reflect permission was granted 22/1442/FUL for 452 homes (net gain of 260 homes). Construction has now started on site. The Housing AMR 2022/23 (SD-079) trajectory expects the site could deliver 170 units over years three to five (2025/26 to 2027/28).

Site Allocation 24: Cassel Hospital – the Site Allocation suggests delivery could come forward in the medium term, with potential for residential uses. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.



**Question 8.3 Is it clear how the expectations for employment, commercial, retail, social and community infrastructure will contribute to an evidenced need?**

Please refer to the overarching document on the Place-Based Strategies containing the Council's response to this question.



Ham Parade is classified as a local centre in the borough centre hierarchy (set out in Policy 17). Ashburnham Road and Ham Street/Back Lane are classified as Important Local Parades. Whilst none of these centres are large enough to be included in the Mayor's Town Centre Network (Annex 1 of the London Plan) they are important and valued centres in meeting the needs of residents and visitors. This is particularly important in this area which is less accessible by public transport than others.

It is noted that in Table 2a of the Summary document to SD-065, Ham centres (Ham Parade, Ashburnham Road and Ham Street/ Back Lane parades) are all identified as clearly serving residents which are relatively disadvantaged, where there is poor public transport

accessibility and is serving communities living in an identified gap in provision. See map on page 27 of the Summary document.

More information and analysis, including review of the borough's centre hierarchy can be found in the Assessment of Borough Centres (SD-065).

There are no employment designations in this part of the borough.

Ham, Petersham and Richmond Park hosts a range of social and community infrastructure uses, notably Richmond Park itself which is the largest of London's Royal Parks and designated European Special Area of Conservation (SAC), National Nature Reserve (NNR) and Site of Special Scientific Interest (SSSI). Other social and community infrastructure uses include Ham Lands, Ham House & Garden, Ham Polo Club, and two golf courses. Other facilities include Ham Youth Centre at Ham Hall and Richmond Maker Labs, which are set to be redeveloped as part of the Ham Close regeneration project (Site Allocation 23). Cassel Hospital (Site Allocation 24), owned by the West London Mental Health Trust, provides treatment for adults and young people with severe and complex personality disorders. There are several educational uses within the area including Meadlands Primary School and two campuses for Strathmore special school (co-located with Grey Court School and Sixth Form and The Russell Primary School).

### Representations

Comments relate to the new pedestrian and cycle bridge (Rep Nos. 230, 231, 232), seeking clarification on details including the location and funding. Whilst there is no firm project in place for a new bridge, it remains an aspiration, based on initial feasibility having been carried out. Individual comments regarding any future application would be more appropriately dealt with at consultation stages for highways and planning permissions.

Ham & Petersham Association & Amenities Group (Rep No. 230) also comment to welcome increased protection for playing fields, whilst also raising the implications for existing informal sport and recreation uses at Ham Common West as a result of increasing the SINC status designation to borough-wide significance. The designation of important priority habitats is not considered incompatible with continuing existing uses.

A member of the public (Jon Rowles) has raised a concern (Rep No 233) about the cumulative impact of development, including in Kingston, on Richmond Park SAC. The Royal Parks also raised (Rep No 234) that Richmond Park should be mentioned in the place-based strategy policy when noting the network of green spaces, as well as the potential impacts of development, including increased traffic, recreational pressure and light

spill on the SAC, SSSI and NNR. The Council considers that the importance of the Royal Parks is recognised in the Plan, along with the recreational pressures faced. There are a number of policies that would apply to their protection. They are referenced in the relevant place-based strategies, by a number of policies in terms of those protecting MOL, biodiversity and nature conservation, views and vistas (Policies 34, 35, 39, 31), and that allow the impacts of development to be assessed (including Policies 53, 37, and 49). These are considered to adequately address the Royal Parks across the Plan as a whole. Planning obligations are also a mechanism to make a development acceptable in planning terms. With regards to pressure on Parks from development, maintenance, management and protection of Parks would be dealt with via planning obligations and the borough Community Infrastructure Levy, which combined contribute to meeting the infrastructure needs of the borough.

The Environment Agency's representation (Rep No. 235) welcomes the need to improve the riverside environment in the 'policy' section of the place-based strategy.

#### Site Allocations: What is expected to be delivered?

Site Allocations located in this area are shown on the map above and considered below.

A number of comments were received during the Local Plan (Publication) Regulation 19 consultation on the following site allocations. For ease, where modifications are agreed, these have been included within the schedule of modification table located at the end of this statement.

- Site Allocation 23 – Ham Close, Ham

Ham & Petersham Association & Amenities Group comment against the place-based strategy (Rep No. 230) that six storey buildings are too high for the area. Please refer to the Council's response to MM18 question 18.6. Construction of the approved scheme (planning application ref. 22/1442/FUL which was approved in 2023) has now started on site.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 24 – Cassel Hospital, Ham Common, Ham

West London NHS Trust made a representation (Rep No. 238) to support the site allocation but they seek removal of the requirement to explore alternative social and community infrastructure uses which in their view would not be viable; nor do they consider the requirement for 100% affordable housing justified; further, the marketing requirement should

be reduced to 6 months. The Council's position is that were an alternative social/community use not be viable, this would be borne out in the justification and marketing evidence. The onus would be on the applicant to demonstrate, via evidence, alternative uses and how they have been assessed and an appropriate approach taken forward. Policy 29 (C) enables this consideration and this would be more appropriately dealt with as part of a pre-application discussion with the Council.

Ham & Petersham Association & Amenities Group comment against the place-based strategy (Rep No. 230) that they would be supportive of a cricket clubhouse on site for the community.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

***Question 8.4 Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?***

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Ham, Petersham & Richmond Park and Site Allocations policies (Chapter 10) are considered to be clearly defined and unambiguous so that it is evident how a decision-maker should react to development proposals.



Table of Modifications – Place Based Strategy – Ham, Petersham and Richmond Park

Details taken from the Schedule of Proposed Modifications suggested by the Council (May 2024) (LBR-002).

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
				<b>Site Allocation 23 Ham Close, Ham</b>
SA23.1	n/a	116	Site Allocation 23 Ham Close, Ham 'Relevant Planning History' box in 'Context' section	<p>Update the planning history:</p> <p>22/1442/FUL – Demolition of existing buildings on-site and change of use of land within Ham Close, the Woodville Day Centre and St Richards Church of England Primary School and the existing recycling and parking area to the east of Ham Village Green for a phased mixed-use redevelopment comprising:</p> <ol style="list-style-type: none"> <li>452 residential homes (Class C3) up to 6 storeys (with plant above)</li> <li>Community/Leisure Facility (Class F2) of up to 3 storeys in height (with plant above)</li> <li>Maker labs (sui generis) of up to 2 storeys</li> <li>Basement car park</li> <li>Provision of on-site cycle, vehicle and servicing parking</li> <li>Provision of amenity space and playspace</li> <li>Site wide landscaping and alterations to Ham Village Green, and</li> <li>New pedestrian, vehicle and cycle access and internal routes and associated highways works. – <del>Committee resolution to approve subject to referral to the GLA at Stage 2 and no adverse direction being received, and conditions/informatives.</del> <u>Permission granted 22/03/2023</u></li> </ol>
				<b>Site Allocation 24 Cassel Hospital, Ham</b>
SA24.1	West London NHS Trust (comment 238)	119 and 120	Site Allocation 24 Cassel Hospital, Ham Common, 'Description of Current Site	<p>Correct the references to the operator of the site.</p> <p>Amend in the description of current site character:</p>

			Character' in 'Context' section, 1 <sup>st</sup> bullet point of 'Vision' section	Owned by <del>West London Mental Health Trust (WLMHT)</del> <del>West London NHS Trust</del> Amend the 1 <sup>st</sup> bullet point of 'Vision' section: Development is dependent on the hospital being declared surplus to requirements and <del>WLMHT's</del> <del>West London NHS Trust's</del> decision...
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**LONDON BOROUGH OF RICHMOND UPON THAMES**  
**LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC**  
**WRITTEN STATEMENT**

**Main Matter 9 – Place Based Strategies and Site Allocations**

**Richmond and Richmond Hill**

**(Site Allocations 25 - 30)**

**TUESDAY 2 JULY 2024**

**COUNCIL RESPONSES TO MAIN MATTER 9**

Document version: 06/06/2024



**Question 9.1 Is the area strategy and are the site allocation policies justified by appropriate available evidence, having regard to national guidance and local context; and are they in ‘general conformity’ with the LP?**

The Area Strategies in the Local Plan have been developed using a consistent approach having regard to national guidance, the London Plan and the local context. Rather than repeating this across each of the Main Matters 4-12, for the sake of brevity the Council's response is set out once, in an overarching document for Main Matters 4-12: Place-based strategies. Each of the Main Matter Statements in relation to each individual area strategy and site allocation policies will therefore only cover matters of relevance to that place.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Richmond and Richmond Hill and Site Allocations (Chapter 11) are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

**Question 9.2 Do the housing site allocations show how they will contribute to the achievement of the RLP's overall housing requirement over the plan period and the timescale for delivery?**

Please refer to the overarching document on the Place-Based Strategies containing the Council's overall response to housing delivery and the site allocations. These are the Site Allocations in this area which have the potential to contribute to housing delivery as follows:

Site Allocation 25: Richmond Station, Richmond - the Site Allocation suggests delivery could come forward in the medium term, including a residential element as a large site. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.

Site Allocation 27: Richmond Telephone Exchange - the Site Allocation suggests delivery could come forward in the medium to long term, as a residential-led scheme. The size of the site suggests it may be brought forward as a small site. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.

Site Allocation 29: Homebase, Manor Road - the Site Allocation suggests delivery could come forward in the short to medium term, with the size of the site suggesting a development could be phased. The Housing Delivery Background Topic Paper (SD-019) notes potential for delivery early in years six to ten (2028/29 to 2032/33) as the site is at advanced stage in planning. The Housing AMR 2022/23 (SD-079) trajectory expects the site could deliver an initial 96.25 units in year five (2027/28). 19/0510/FUL for 453 units was

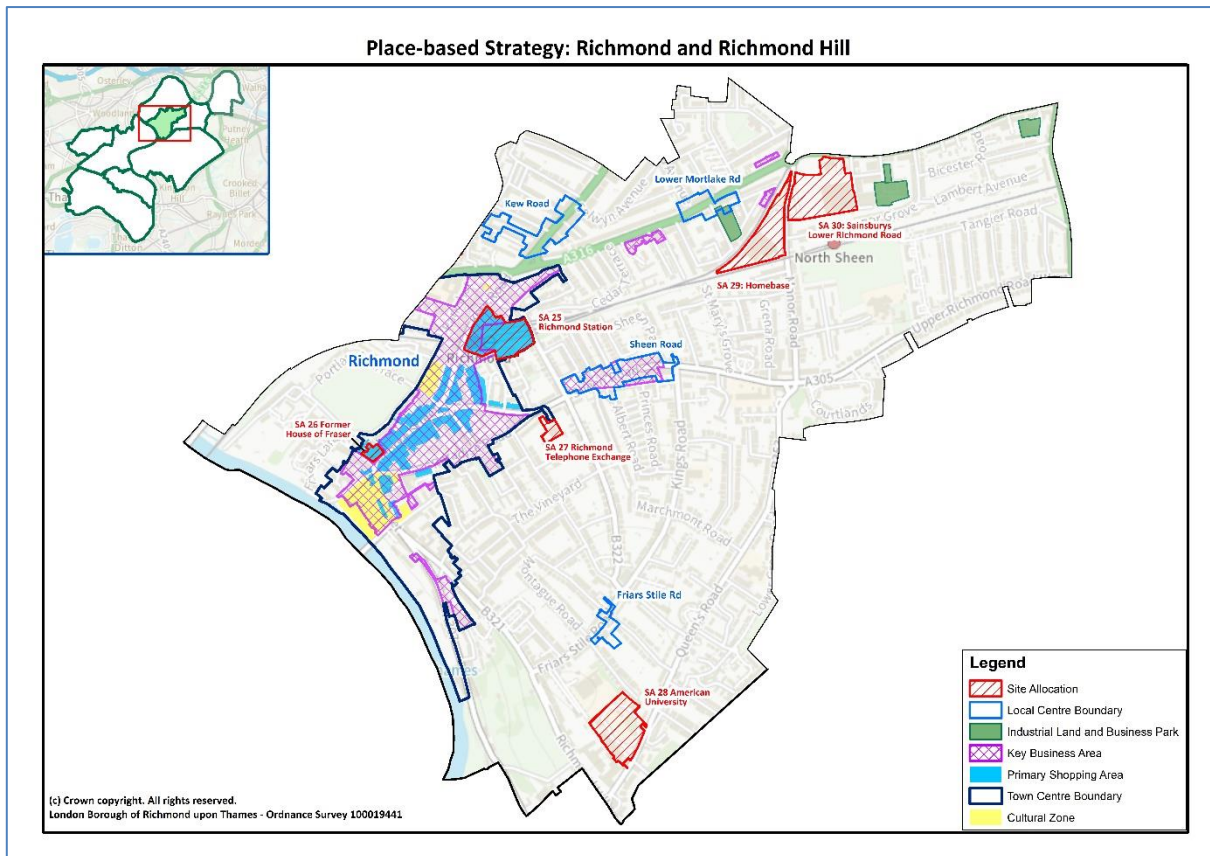
called-in by the Mayor of London, with the decision notice granting permission issued on 23 May 2024. A modification could be suggested during the course of the Examination to update the planning history.

Site Allocation 30: Sainsburys, Lower Richmond Road – the Site Allocation suggests delivery could come forward in the medium to long term, including for residential use as a large phased site. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory in years one to five (2023/24 to 2027/28).

There is no housing delivery expected from Site Allocation 26: Former House of Fraser, Richmond or Site Allocation 28: American University.

***Question 9.3 Is it clear how the expectations for employment, commercial, retail, social and community infrastructure will contribute to an evidenced need?***

Please refer to the overarching document on the Place-Based Strategies containing the Council's response to this question.



Richmond, the largest of the centres in this area is classified as a town centre in the borough centre hierarchy (set out in Policy 17) and a major centre in the Mayor's Town Centre Network (Annex 1 of the London Plan). Sheen Road and Friars Stile Road are classified as neighbourhood centres, whilst Lower Mortlake Road and Kew Road are classified as Important Local Parades.

It is noted that in Table 2a of the Summary document to SD-065, Friars Stile Road parade is identified as clearly serving some residents which are relatively disadvantaged (to the east), where there is poor public transport accessibility and is serving communities living in an identified gap in provision.

More information and analysis, including review of the borough's centre hierarchy can be found in the Assessment of Borough Centres (SD-065).

The map above also shows the location of the Key Business Areas (KBA) which cover a large part of Richmond, highlighting the significance of the town centre for the provision of office floorspace in the borough. There are a number of Locally Important Industrial Land and Business Parks in B8 use located along the main A316 Lower Mortlake Road/Lower Richmond Road (Big Yellow Self Storage, Lower Mortlake Road, Big Yellow Self Storage, Lower Richmond Road and Currie Easy Self Storage, Market Road).

The proposed Richmond Cultural Quarter (see map above, and the Council's response to Main Matter 14) contains an array of social and community infrastructure uses including the Orange Tree Theatre, Richmond Theatre, libraries, Duke Street Church, and Curzon and ODEON cinemas. Other social and community infrastructure uses within the Richmond and Richmond Hill areas include the Cambrian Community Centre, the Vineyard Community Centre, Terrace Gardens, Richmond Indoor Bowls Club, and several places of worship. Educational uses within the area include Holy Trinity Church of England Primary and Nursery School, King's House School, Radnor House Prep School, and the former American University site (Site Allocation 28) where it is expected that an educational use will continue on site.

### Representations

A comment received from a member of the public (Julie Scurr, Rep No. 239) raises a concern about over-saturation of food and drink provision in and concerns about the night-time economy, and that the priority should be to attract shopping. The government's introduction of the combined commercial, business and service use class in 2020 introduced a greater flexibility for changes of use including shops, cafes, restaurants, offices, gyms and health centres which the Council has limited powers to control. Notwithstanding this, the Plan sets out policies for when they can be applied and a vision and objectives in each place-based strategy. The Plan recognises the benefit of maintaining a concentrated retail core, and has designated Primary Shopping Areas in the larger centres which are the preferred locations for shops on the ground floor of units, and where new retail development is encouraged to locate.

Another comment (Roger Byatt, Rep No. 240) questions why there are no plans for the pedestrianisation of George Street. The Plan as a whole promotes active travel, with reference to enhancing the public realm in the place-based strategy. The Council's Local Implementation Plan refers to the potential long-term interventions for George Street including full or partial pedestrianisation, but as the Council will look at options it is considered too early to include any further details in the Local Plan.

The Royal Parks (Rep No. 241) raises concerns about impacts of development and recreational pressures on Richmond Park. Please see the Council's response to MM 8 question 8.3 above.

Network Rail (Southern) commented (Rep No. 242) that reference be made to the need to improve station access and the securing of developer contributions. Please see the Council's response MM 6 question 6.3 above.

The Environment Agency's representation (Rep No. 243) welcomes that the 'policy' section of the place-based strategy emphasises the need to improve the riverside environment.

Prospect of Richmond have commented (Rep No. 244) to question the place definitions, and that the four Conservation Area components should be separately identified, the character area boundaries should match the Conservation Area boundaries, and that the places should be retitled. This is a reiteration of a comment made on the (Pre-Publication) Regulation 18 Plan. The text to the character area profile was amended in the Regulation 19 Plan to more explicitly refer to the four Conservation Areas as core of town centre character area, although the character area boundaries are considered to be logical and appropriate. See the Council's response in the Overarching Statement on the place-based strategies which references the methodology of the UDS (SD-052).

Prospect also raised a concern that the RBID vision is likely to have bias towards business and only covers parts of the town centre. The policy mentions the current BID in the 'other initiatives' section but there is not a reliance on their work to inform the Local Plan; rather, there is a recognition that a BID exists and there has been work to set out a vision for a thriving town centre. They are a key stakeholder. That a BID has been set up to represent participating businesses, and that the BID is referenced in the Local Plan as an initiative which promotes Richmond, does not mean that the Plan itself is biased towards businesses at the expense of residents, the basis for which is based on the Council's own evidence base.

Old Deer Park Working Group have commented (Rep No. 245) to suggest that the Old Deer Park should be covered by its own Character Area. The Council does not consider that the Old Deer Park warrants its own character area, as it would not be appropriate for the broader scale of the UDS (SD-052).

#### Site Allocations: What is expected to be delivered?

Site Allocations located in this area are shown on the map above and considered below.

A number of comments were received during the Local Plan (Publication) Regulation 19 consultation on the following site allocations. For ease, where modifications are agreed, these have been included within the schedule of modification table located at the end of this statement.

- Site Allocation 25 – Richmond Station, Richmond

A number of representations raise comments about the Tall Building Zone. Please refer to the Council's response to MM18 question 18.6.

CPRE London's representation (Rep No. 246) suggests that the car park next to the station should be removed and not re-provided, and that the space above the railway tracks should be kept open. The Council considers that the allocation allows for flexibility of future development including an integrated transport hub. Please also note that Network Rail (Southern) have commented (Rep No. 251) to support the allocation, and TfL have stated (Rep No. 248) that they welcome the reference to a partnership approach.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 26 – Former House of Fraser, Richmond

Prospect of Richmond commented (Rep No. 254) to suggest that the text is amended to reference that any redevelopment provides for enhancement of external elevations and removal of existing roof structures to enhance views, and that any development should not be higher than the existing building. The site allocation text is considered to be sufficient as it makes clear that any development proposals must be of the highest quality in character, respond positively to the Conservation Area and protect and where possible enhance on site and neighbouring listed and locally listed heritage assets.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 27 – Richmond Telephone Exchange, Richmond

Prospect of Richmond have commented (Rep No. 256) to express support for a low-rise development of what is currently an eye-sore. Whilst the Site Allocation does not specifically state only a low-rise development would be acceptable, it does state that conversion of the existing building should be the starting point for any future development, and that if the site is to be redeveloped, any height should take into account the residential properties which adjoin the site.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 28 – American University, Queens Road, Richmond

Prospect of Richmond have commented (Rep No. 258) to suggest that the text is amended to reference that any development should be no higher than the three-storey part of the existing buildings. The Council's position is that it is not considered reasonable to be prescriptive regarding heights for its own sake; rather it is the Council's intention to ensure

that heritage assets are protected and where possible enhanced, and that development reflects the character of the area. Heights would therefore be considered as part of that assessment, and it is not considered necessary to specifically reference a restriction in the Site Allocation.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 29 – Homebase, Manor Road, North Sheen

Please refer to the Council's response to MM18 and question 18.6 with regards to comments received on the Tall Building Zone. Please also note that the decision to approve planning permission (application ref. 19/0510/FUL) has now been issued by the Mayor of London, on 23 May 2023.

Network Rail (Southern) have commented (Rep No. 262) to express support for the allocation, but raise the opportunity to secure improvements to North Sheen train station and that the adjacent level crossing should be included in the allocation, with reference to securing safety mitigations as necessary. TfL's comment (Rep No. 260) expresses support for the allocation. The appropriate mechanism to secure transport improvements, to make a planning application acceptable in planning terms, is via planning obligations, which can be secured at full application stage. Whether the areas of improvement are within or outside of the Site Allocation boundary does not preclude this.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 30 – Sainsbury's, Lower Richmond Road, Richmond

A comment has been received suggesting that the UDS (SD-052) study comprises a flawed analysis and that the Tall and Mid-Rise Building Zone should be deleted. Please refer to the Council's response to MM18 and question 18.6 with regards to comments received on the Tall Building Zone, and also the Council's response in the Overarching Statement on the place-based strategies which references the methodology of the UDS (SD-052).

TfL's representation (Rep No. 265) raises a concern that the reference to re-provide car parking is inappropriate and there should be an expectation, given the PTAL, that development is car-free. The Council's position is that, while there is an overall aim in the RLP to reduce car dependency, car-parking provision would be assessed on a case by case basis and, as stated, in line with London Plan standards. It is also noted that Sainsbury's

Supermarkets Ltd comment (Rep No. 266) expresses support for the requirement to provide adequate car parking in line with London Plan standards, though also raise the need to provide adequate servicing areas and operational land. It is considered that these matters would be appropriately dealt with at full planning application stage. With regards the reference to the car parking provision, it is expected that this may be discussed with other respondents.

Network Rail (Southern) have commented (Rep No. 267) to express support for the allocation, but raise the opportunity to secure improvements to North Sheen train station and that the adjacent level crossing should be included in the allocation, with reference to securing safety mitigations as necessary. Planning obligations are a mechanism to secure financial contributions to make a development acceptable in planning terms, and would be dealt with at full planning application stage.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

***Question 9.4 Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?***

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Richmond & Richmond Hill and Site Allocations policies (Chapter 11) are considered to be clearly defined and unambiguous so that it is evident how a decision-maker should react to development proposals.





Table of Modifications – Place Based Strategy – Richmond and Richmond Hill

Details taken from the Schedule of Proposed Modifications suggested by the Council (May 2024) (LBR-002).

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
				<b>Site Allocation 25 Richmond Station</b>
FP.15	n/a	126	Site Allocation 25 Richmond Station	To update terminology in Plan. In context box, fourth column, amend as follows:  Richmond <b>main town</b> centre boundary
				<b>Site Allocation 29 Homebase, Noth Sheen</b>
SA29.1	n/a	141	Site Allocation 29 Homebase, Manor Road, 3 <sup>rd</sup> bullet point of 'Vision' section	Delete erroneous bracket: There is a need for housing in the borough and this site is considered suitable for a substantial provision of new housing units including a policy compliant level of affordable housing).

**LONDON BOROUGH OF RICHMOND UPON THAMES**  
**LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC**  
**WRITTEN STATEMENT**

**Main Matter 10 – Place Based Strategies and Site Allocations**

**Kew**

**(Site Allocations 31 - 34)**

**TUESDAY 2 JULY 2024**

**COUNCIL RESPONSES TO MAIN MATTER 10**

Document version: 06/06/2024

***Question 10.1 Is the area strategy and are the site allocation policies justified by appropriate available evidence, having regard to national guidance and local context; and are they in ‘general conformity’ with the LP?***

The Area Strategies in the Local Plan have been developed using a consistent approach having regard to national guidance, the London Plan and the local context. Rather than repeating this across each of the Main Matters 4-12, for the sake of brevity the Council's response is set out once, in an overarching document for Main Matters 4-12: Place-based strategies. Each of the Main Matter Statements in relation to each individual area strategy and site allocation policies will therefore only cover matters of relevance to that place.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Kew and Site Allocations (Chapter 12) are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

***Question 10.2 Do the housing site allocations show how they will contribute to the achievement of the RLP's overall housing requirement over the plan period and the timescale for delivery?***

Please refer to the overarching document on the Place-Based Strategies containing the Council's overall response to housing delivery and the site allocations. These are the Site Allocations in this area which have the potential to contribute to housing delivery as follows:

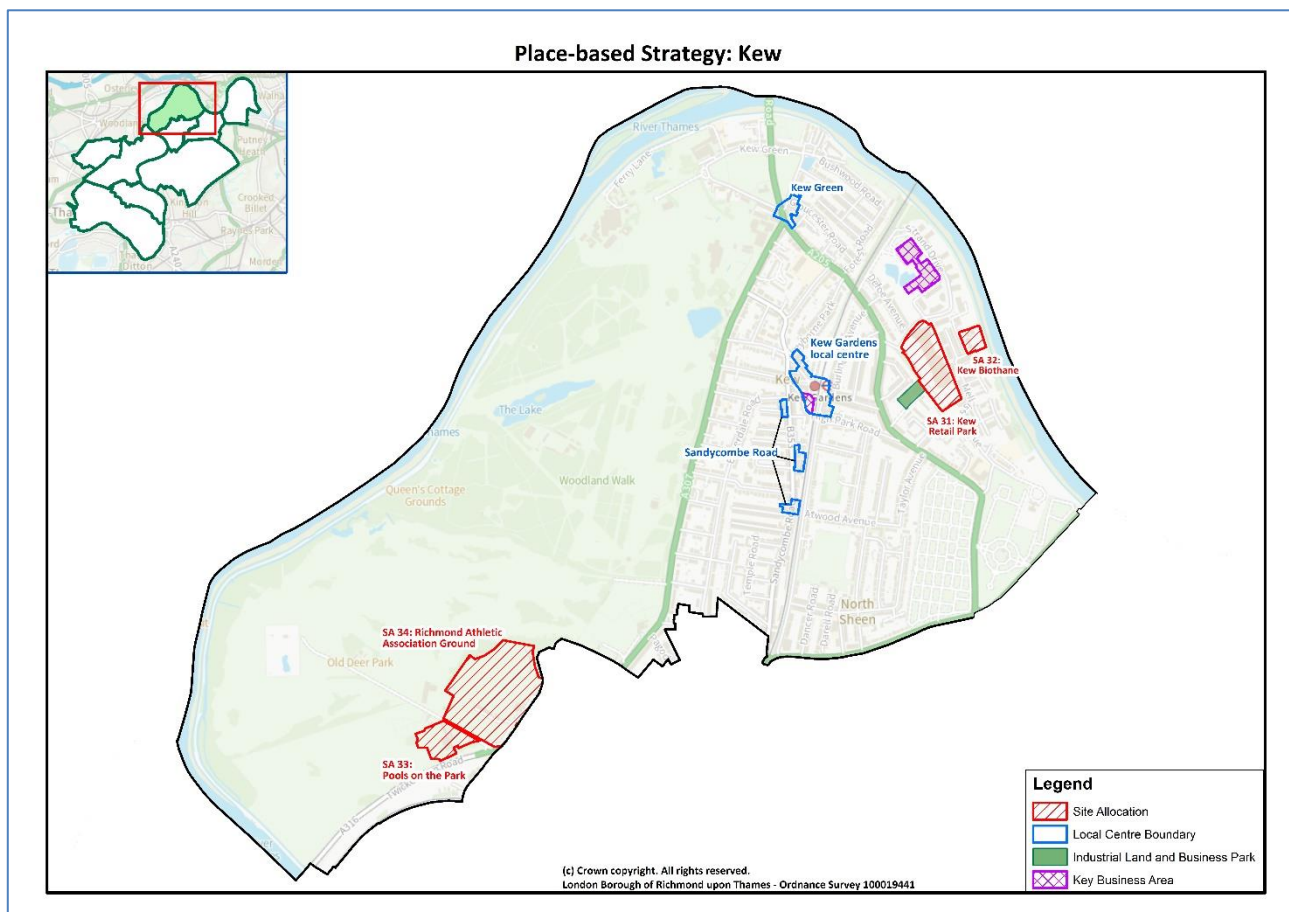
Site Allocation 31: Kew Retail Park – although currently at pre-application stage and therefore not included in the AMR housing trajectory, there is a willing developer pursuing plans including housing. The Site Allocation suggests delivery could come forward in the short to medium term, with the size of the site suggesting a development could be phased. The Housing Delivery Background Topic Paper (SD-019) expects several hundred new homes could come forward with potential for delivery later in the later phases of housing supply (years six to ten 2028/29 to 2032/33).

Site Allocation 32: Kew Biothane Plant – the Site Allocation suggests delivery could come forward in the short-term for housing. The Housing AMR 2022/23 (SD-079) trajectory expects the site could deliver 88 units towards the end of years one to five (2026/27 to 2027/28). A suggested modification (SA32.1 in LBR-002 and in the extract of relevant modifications below) notes works have commenced on site to implement the permission for an 88 residential specialist extra care home of 4-6 storeys (18/3310/FUL).

There is no housing delivery expected from Site Allocation 33: Pools on the Park and surroundings, Old Deer Park or Site Allocation 34: Richmond Athletic Association Ground, Old Deer Park.

**Question 10.3 Is it clear how the expectations for employment, commercial, retail, social and community infrastructure will contribute to an evidenced need?**

Please refer to the overarching document on the Place-Based Strategies containing the Council's response to this question.



Kew Gardens centre is classified as a local centre in the borough centre hierarchy (set out in Policy 17). Sandycombe Road and Kew Green are classified as Important Local Parades. Whilst none of these centres are large enough to be included in the Mayor's Town Centre Network (Annex 1 of the London Plan) they are important and valued centres in meeting the needs of residents and visitors. Kew Retail Park (Site Allocation 31) is also located within the area. More information and analysis, including review of the borough's centre hierarchy can be found in the Assessment of Borough Centres (SD-065).

The map above also shows the location of two Key Business Areas at The National Archives, Ruskin Avenue, Kew and Blake Mews, Station Avenue, Kew. There is a Locally Significant Industrial Land and Business Park at Marlborough Trading Estate, Mortlake Road, Kew. If a development comes forward for Kew Retail Park (Site Allocation 31) it is expected that it will include an element of office floorspace, including affordable workspace within a mix of commercial uses.

Kew hosts a range of social and community infrastructure uses, notably the Royal Botanic Gardens, Kew which is a UNESCO World Heritage Site. Other social and community infrastructure uses include Old Deer Park (including Pools on the Park and surroundings (Site Allocation 33) and Richmond Athletic Association Ground (Site Allocation 34)), Kew Green, Kew Community Trust's Avenue Halls, and Royal Mid-Surrey Golf Club. There are several educational uses within the area including a number of nurseries and primary schools.

#### Site Allocations: What is expected to be delivered?

##### Site Allocation 31: Kew Retail Park

### **Retail Matters**

At the current time no planning application has been received by the Council who will work proactively to deliver the vision in Site Allocation 31 were an application to come forward at Kew Retail Park with the relevant partners.

It is considered that SA 31 is justified by appropriate evidence, positively prepared, effective and is consistent with national policy and in conformity with the London Plan. It is noted that the GLA have not raised conformity issues with this or any other Site Allocation (SA). The SA allows for and encourages the redevelopment of the site in the spirit of the London Plan policies SD6 A 3, E9 C 6 and H1 B2 B.

Comments on the Regulation 19 Plan have been received from Mark Knibbs (Avison Young with input from Montagu Evans & Energist) on behalf of St George plc and Marks and Spencer in relation to Site Allocation 31 and various points raised are discussed below.

Please refer to the Written Statement to Main Matter 14 - Shaping and supporting our town and local centres (Policies 17-20) which covers in detail the robust evidence supporting the policy approach and sets out the reasoning why these policies are sound. Of particular relevance to matters raised by respondent is the **Richmond Retail and Leisure Needs**

**Study:**

- Retail & Leisure Needs Study Phase 1 Update (July 2021) (RLNS Phase 1) (SD-059)
- Retail & Leisure Needs Study Phase 2 Final Report (January 2023) (RLNS Phase 2) (SD-060)
- Retail & Leisure Needs Study – Update Addendum (April 2024) (PSED-02)

These reports include a quantitative assessment of need for retail and food and beverage uses and translate that forecast need into a floorspace requirement/surplus. The RLNS Phase 2 Report includes a qualitative assessment including audits of the five town centres and analysis of local centres. It also includes an assessment of need for other main town centre uses including commercial leisure, entertainment and cultural uses.

Also, of significance is the **Assessment of Borough Centres 2023 (SD-065)**, published in four volumes plus a summary. This research robustly assessed the centres in the borough hierarchy using a wide range of indicators (with reference to NPPG, Planning for town centre vitality and viability, paragraph 006) and data sources. Its purpose was to:

- review the centre hierarchy – ensuring that centres were categorised in the correct tier;
- review centre boundaries where they existed and define them for centres where they did not; and to
- consider the need for Primary Shopping Areas and define these boundaries for the five town centres.

Need for increase in convenience provision on site.

The respondent argues that there is a need to provide a main food shopping opportunity (bulk shopping) in Kew in order to meet objectively assessed needs and to achieve the “living locally” concept. Data are provided to show that Kew residents do not live within a 10 minute walk of such facilities and instead largely do their main food shopping elsewhere. On the first point, the Council considers that the extensive evidence base on this subject provides a very robust basis on which to assess whether needs have been met, both qualitatively and quantitatively. Put simply, the revised forecasts in the RLNS Update Addendum (PSED-02) suggests that the borough is likely to have surplus retail floorspace over the Plan period and that there is no pressing need for further allocations for retail and that the focus should be to re-purpose vacant retail space and direct investment into existing centres. (Although it is recognised in the Local Plan that not all development is likely to be accommodated in repurposed space.) The global over-supply of convenience goods retail floorspace is 1,831 sq.m gross in 2039. The RLNS study area is divided into seven zones and forecasts have been provided for each. For Zone 6 Kew/North Richmond the projected forecast for convenience retail floorspace is a small over-supply of 111 sq.m gross up to 2029 and a requirement of 67 sq.m gross in 2034 increasing to 93 sq.m gross in 2039.

On the second point, the Council strongly considers that the “Living Locally” concept would not encompass the provision of main food shopping opportunities for all residents within 20-minutes walking distance of their homes, rather it is aimed at “*giving people the ability to meet most of their daily needs*” (Policy 1). See Written Statement for Matter 2 for more detail on the concept. The May 2022 household survey results suggested 20.3% of households did their main food and grocery shop via the internet/delivery. Of those who travelled for main food and grocery shopping, 62% travelled by car and a further 8% travelled by bus. These results indicate very few households across the borough undertake their main/bulk food and grocery shopping on foot. The household survey results also indicate comparable or higher levels of convenience goods expenditure retention in the Zone 6 – Kew / North Richmond when compared with other zones. Within study area Zone 6, 54.6% of convenience goods expenditure was retained and spent within the zone. The average across all 6 study area zones was only 50.4%. The household survey results indicate there is a high degree of convenience goods expenditure flows to and from each zone and this is not unusual for London boroughs. The evidence suggests there is no quantitative or qualitative need for additional convenience goods provision in the Kew local area. Further convenience goods retail floorspace in this area could result in an over-supply of facilities and the potential implications of this need to be considered.

Local shopping opportunities already exist at Kew Retail Park (and at Kew Gardens local centre, Kew Green and Sandycombe Road local parade). Indeed, the evidence provided by the Retail and Leisure Study Phase 2 (SD-060) and the Assessment of Borough Centres (SD-065) in terms of assessing and mapping available provision indicate that there is reasonable provision of local shopping opportunities across the borough. It is the view of the Council that the impact of an increased convenience offer at Kew Retail Park is best assessed through a Retail Impact Assessment (RIA) at the planning application stage. The respondent suggests the removal of the sentence which relates to there being no increase in convenience provision (the cap) and instead suggests a new sentence which refers to the national policy tests being satisfied. The Council’s response is set out in more detail in the Written Statement to Main Matter 14. However, it is noted that amendments were included in the submitted Plan which addressed this issue and subsequently a Proposed Modification P18.1 provides further clarification. Therefore, it is not considered necessary to include a further reference to satisfying the national tests within SA 31 itself. With regard to the cap, the respondent considers that there it is not supported by any recommendations in or justified by the RLNS (Phases 1 or 2). It is not the purpose of the RLNS to make recommendations on the detail of Site Allocations, although it is noted that



the outcome of the RLNS would not in any case support any significant increase in convenience goods retail provision. The imposition of the cap relates more to the particulars of the site which has an existing condition attached to the grant of planning permission restricting an increase in convenience goods retail provision. This is a matter of fact which would need to be considered when an application was submitted. This condition allows the LPA to consider amongst other matters, the impact of the proposal at the planning application stage.

It is not unreasonable for a Site Allocation to consider the quantum of a particular type of floorspace, particularly where mixed use development is proposed and scale of different elements are uncertain. The purpose of the SA is to set the framework for development of the site. The Site Allocation is not deemed consent and a planning application will be needed. Generally, it is unlikely that proposals will be wholly in accordance with a SA and therefore it is accepted that proposals will be tested against policies in the development plan, which would include those which deal with the national policy tests.

A number of detailed points are also raised by the respondent:

- the site can only be redeveloped if the proposal includes substantial replacement retail. The Council considers that a proposal must be policy compliant and that overall viability will be tested through the development management process.
- there is no breakdown between main and top-up expenditure. However, the RLNS Phase 2 Report (paragraph 4.22) clearly indicates a 70:30 split between main and top-up expenditure has been adopted, which is a widely accepted expenditure split. A summary of the main and top-up market shares is shown in Table 4.1.
- the RLNS has not considered over-trading. A high proportion of the retail provision in the borough is independent traders and no information on net sales floorspace and average sales densities is available to accurately quantify under or over-trading. The main food stores are observed to be trading healthily at peak periods, but there is no evidence of unacceptable levels of over-trading for example in terms of queues at checkout, lack of available car parking spaces or under-stocked shelves.
- Kew Gardens is a healthy centre and resilient to the impacts of competing development elsewhere. The Council considers that it does not follow that a significant increase in convenience floorspace at Kew Retail Park will not have an impact on the local centre and that a RIA is required to test this. Convenience goods retail is an important element of Kew Garden's overall offer. A significant reduction in food/grocery trade and the potential loss of linked trips must be carefully considered.

Please note that an error in apportioning the figures in the Phase 2 Report is acknowledged in the Update Addendum (PSED- 02) in paragraph 3.1. In any case, the revised capacity forecasts in the Update Addendum supersede those presented in the Phase 2 Report.

### Representations

A comment has been received (Rep No. 270) which raises concerns about an increase in the population and the implications for local policing. Policy 49 requires major developments to assess potential impacts on existing infrastructure, with policing referred to in the Planning Obligations SPD and in the Infrastructure Delivery Plan.

Network Rail (Southern) have commented (Rep Np. 271) that they support the place-based strategy, especially maintaining and enhancing the retail offer around Kew Gardens Station, and wayfinding and active travel.

Prospect of Richmond and Older Deer Park have commented that the Old Deer Park (Rep Nos. 272 & 273 respectively) should be covered by its own character area. Please see the Council's response to question 9.3 in the 'Representations' section above.

### Site Allocations

Site Allocations located in this area are shown on the map above and considered below.

A number of comments were received during the Local Plan (Publication) Regulation 19 consultation on the following site allocations. For ease, where modifications are agreed, these have been included within the schedule of modification table located at the end of this statement.

- Site Allocation 31 – Kew Retail Park

A number of representations raise comments about the Tall Building Zone. Please refer to the Council's response to MM18 question 18.6.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Historic England's comments.

TfL's comment (Rep No 276) states that the PTAL baseline should be 2. A modification has been agreed with TfL in the Statement of Common Ground (SOC-03) to amend the reference to parking in the vision to ensure consistency with London Plan Policy T6.

St George plc and Marks & Spencer's representation supports the allocation, but raises a concern that the restriction on convenience retail provision has been maintained, and

consider that there is a need to improve convenience goods retail provision in Kew to meet main shopping needs. Please see the Council's response above in the retail section.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 32 – Kew Biothane Plant

Meliss Ave Deco Ltd (now in administration) c/o RSM have submitted a representation (Rep No. 282) which raises a concern that the requirement for improvements to the MOL in the vision goes beyond the requirements of Policy 35. Please refer to the Council's response to MM14. Note that works approved in the planning permission have recently ceased on-site.

The Environment Agency (Rep No. 280) have commented that the site has been identified as a key opportunity for WFD improvement by way of managed realignment of the flood defence. Any development would need to take into account the site's proximity to the River Thames and high risk of flooding, as the site constraints for flood risk are identified in the Site Allocation.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 33 – Pools on the Park

Old Deer Working Group have submitted a comment (Rep No. 284) raising that the Statement of Significance needs to be amended before adoption and that the text should take into account community requests that the Pools complex and surrounding landscape be designated as MOL. It is clear the Statement of Significance referred to is a draft, and it is not considered that the site would score sufficiently highly against the criteria used in the Open Land Review (SD-054) and consequently there are no plans to extend the surrounding MOL designation.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 34 – Richmond Athletic Association Ground

Sport England have commented (Rep No. 286) to state that they support the vision.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

***Question 10.4 Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?***

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Kew and Site Allocations policies (Chapter 12) are considered to be clearly defined and unambiguous so that it is evident how a decision-maker should react to development proposals.



Table of Modifications – Place Based Strategy – Kew

Details taken from the Schedule of Proposed Modifications suggested by the Council (May 2024) (LBR-002).

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
				<b>Site Allocation 31 Kew Retail Park, Kew</b>
SA31.1	Transport for London (TfL) (comment 276)	149	Site Allocation 31 Kew Retail Park, Bessant Drive, Kew. 1 <sup>st</sup> bullet point of 'Transport/Highways' box in 'Context' section	<p>[See also Statement of Common Ground with TfL (signed 28/02/2024) (SOCG-03)] Add:</p> <ul style="list-style-type: none"> <li>PTAL 0-2 'worst <b>to poor</b>'</li> </ul>
SA31.2	n/a	151	Site Allocation 31 Kew Retail Park, Bessant Drive, Kew. Last sentence of 2 <sup>nd</sup> bullet point under Vision	<p>For clarity, amend:</p> <p><del>...Any new convenience retail provision should not exceed the floorspace of the existing units, to protect the existing local centre in Kew. There should be no increase in convenience floorspace, to protect the existing local centre in Kew.</del></p>
SA31.3	n/a	151	Site Allocation 31 Kew Retail Park, Bessant Drive, Kew. 8 <sup>th</sup> bullet point under vision	<p>Correct the typo:</p> <p>The applicant will be required to submit a full transport assessment completed in accordance with local and London-<u>wide</u> guidance.</p>

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
				<b>Site Allocation 32 Kew Biothane Plant, Kew</b>
SA32.1	n/a	154	Site Allocation 32 Kew Biothane Plant, 'Relevant Planning History' in 'Context' box	Update the planning history:  An application for 88 residential specialist extra care home of 4-6 storeys was granted planning permission at Committee 16/09/2020 (ref. 18/3310/FUL). <b>Works commenced on site but have not been completed. This permission has not been implemented.</b>
SA32.2	n/a	155	Site Allocation 32 Kew Biothane Plant, 3 <sup>rd</sup> bullet point under Vision.	Typo correction:  The submission of an odour impact assessment would be requireds upfront.

**LONDON BOROUGH OF RICHMOND UPON THAMES**  
**LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC**  
**WRITTEN STATEMENT**

**Main Matter 11 – Place Based Strategies and Site Allocations**

**Mortlake and East Sheen**

**(Site Allocations 35 - 38)**

**TUESDAY 2 JULY 2024**

**COUNCIL RESPONSES TO MAIN MATTER 11**

Document version: 06/06/2024



**Question 11.1 Is the area strategy and are the site allocation policies justified by appropriate available evidence, having regard to national guidance and local context; and are they in ‘general conformity’ with the LP?**

The Area Strategies in the Local Plan have been developed using a consistent approach having regard to national guidance, the London Plan and the local context. Rather than repeating this across each of the Main Matters 4-12, for the sake of brevity the Council's response is set out once, in an overarching document for Main Matters 4-12: Place-based strategies. Each of the Main Matter Statements in relation to each individual area strategy and site allocation policies will therefore only cover matters of relevance to that place.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Mortlake and East Sheen and Site Allocations (Chapter 13) are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

**Question 11.2 Do the housing site allocations show how they will contribute to the achievement of the RLP's overall housing requirement over the plan period and the timescale for delivery?**

Please refer to the overarching document on the Place-Based Strategies containing the Council's overall response to housing delivery and the site allocations. These are the Site Allocations in this area which have the potential to contribute to housing delivery as follows:

Site Allocation 35: Stag Brewery - the Site Allocation suggests delivery could come forward in the short to medium term, with the size of the site suggesting a development could be phased. The Housing Delivery Background Topic Paper (SD-019) notes the potential for delivery to start towards the end of the early period in years one to five (2023/24 to 2027/8). The Housing AMR 2022/23 (SD-079) trajectory expects the site could deliver an initial 150 units in year five (2027/28). A suggested modification (SA35.2 in LBR-002 and in the extract of relevant modifications below) notes an appeal has been lodged to the non-determination of 22/0900/OUT and 22/0902/FUL. Following amendments the proposal increased to 1,075 units. The Stag Brewery inquiry is due to take place this year.

Site Allocation 36: Mortlake and Barnes Delivery Office – the Site Allocation suggests delivery could come forward in the medium to long term, with a residential element. The size

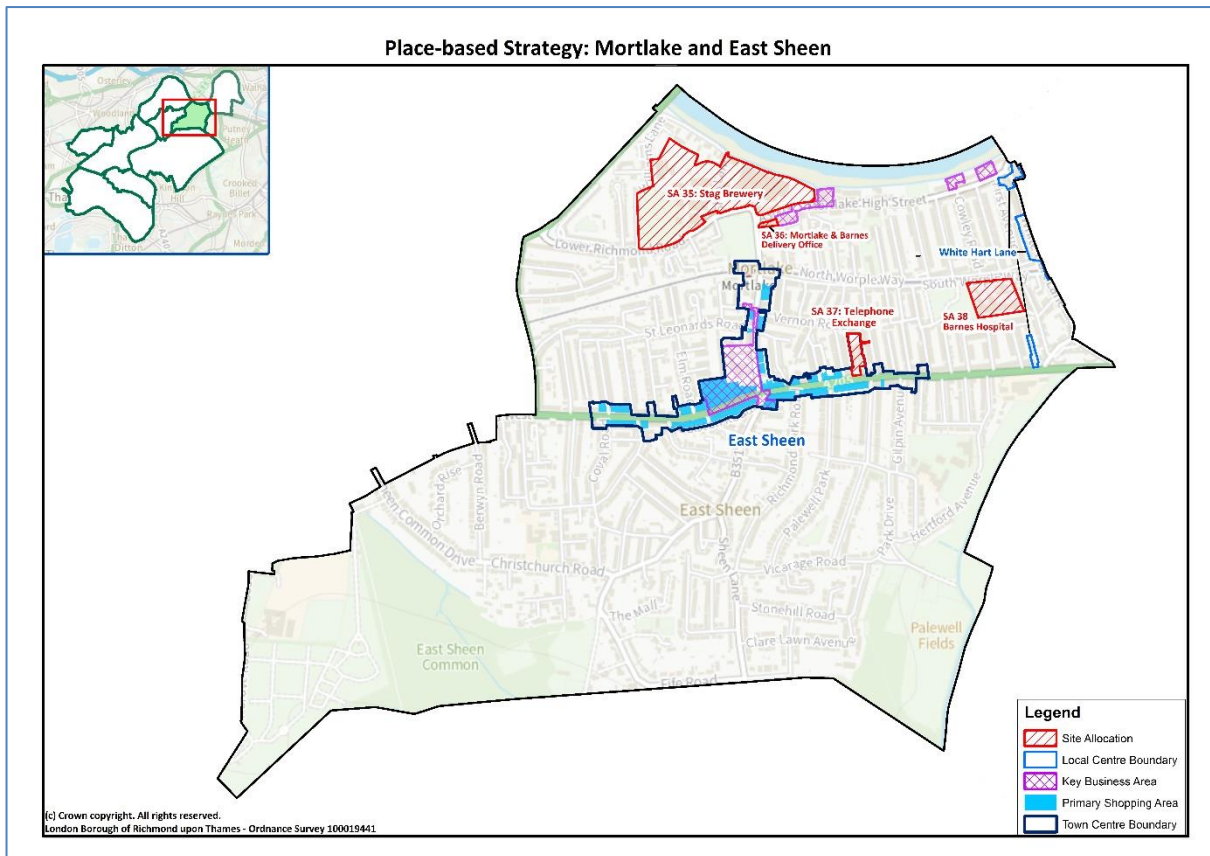
of the site suggests it may be brought forward as a small site. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.

Site Allocation 37: Telephone Exchange and 172-176 Upper Richmond Road West – the Site Allocation suggests delivery could come forward in the medium to long term, with a residential element. The size of the site suggests it may be brought forward as a small site. There is no capacity included in the Housing AMR 2022/23 (SD-079) trajectory.

Site Allocation 38: Barnes Hospital – the Site Allocation suggests delivery could come forward in the short-term for housing. For the residential element, following the earlier outline consent 18/3642/OUT, 21/3107/FUL is for 107 residential units. Resolution to grant permission by Planning Committee subject to completion of a S106 agreement 22/05/2024. The Housing AMR 2022/23 (SD-079) trajectory expects the site could deliver 41.5 units towards the end of years one to five (2027/28). A modification could be suggested during the course of the Examination to update the planning history.

***Question 11.3 Is it clear how the expectations for employment, commercial, retail, social and community infrastructure will contribute to an evidenced need?***

Please refer to the overarching document on the Place-Based Strategies containing the Council's response to this question.



East Sheen is designated as a town centre in the borough centre hierarchy (as set out in Policy 17) and a district centre in the Mayor’s Town Centre Network (Annex 1 of the London Plan). White Hart Lane (Barnes/Mortlake) is classified as a neighbourhood centre. More information and analysis, including review of the borough’s centre hierarchy can be found in the Assessment of Borough Centres (SD-065). It is noted that in this report East Sheen is identified as a centre important for meeting local need (please see in particular pages 85-86 of Volume 1 of SD-065).

The map above also shows the location of a number of Key Business Areas (KBA) which are focused on East Sheen centre and along Mortlake High Street. If the development at Stag Brewery comes forward, it is expected that this will provide a significant amount of employment floorspace within an appropriate mix of uses, as part of the comprehensive redevelopment of the site. Site Allocation 35 identifies a requirement for a substantial mix of employment uses, including lower-cost units suitable for small businesses, creative industries and scientific and technical businesses including green technology. Other employment uses will also be supported.

Mortlake and East Sheen hosts a range of social and community infrastructure uses including Palewell Playing Fields, Sheen Lawn Tennis & Squash Club, Shene Sports & Leisure Centre, East Sheen Library, and Sheen Lane Day Centre. There are a number of

educational uses within the area including Richmond Park Academy, Christ's School and Sixth Form, and Thomson House School. The regeneration of the former Stag Brewery site (Site Allocation 35) presents an opportunity for a new secondary school with sixth form for which there is a clear identified need as explained in the Council's School Place Planning Strategy (SPPS) (SD-102). The SPPS also identifies need for additional school places in the specialist school places sector, and the Barnes Hospital site (Site Allocation 38) will contribute to this need.

### Representations

Councillor Niki Crookdale has made a representation (Rep No. 288) suggesting a number of changes to the strategy, including to acknowledge the lack of open green space, the need to upgrade Mortlake High Street, traffic congestion and the PTAL. Her comment also suggests adding reference to a green link bridge connecting the north and south towpaths, if feasible, to Chertsey Court as another site allocation, and questions the need for a new secondary school at the Stag Brewery site.

While the place-based strategies have been informed by a variety of sources and include a vision and objectives for each area, some of the language and initiatives suggested for inclusion are not considered appropriate for inclusion in a Local Plan, such as name of a children's centre or the need for new lifts in existing residential.

The Transport Background Topic Paper (SD-020) sets out the traffic modelling for the Borough for the lifetime of the Plan, and addresses development in the Mortlake area including the cumulative traffic arising from major sites. In addition, at the decision-making level, the Council encourages applicants to use the pre-application advice service it offers to work with Council and TfL Officers to agree with parameters of any vehicular traffic impact assessment and the tools used to complete this. In practice, where the development is a major one a full transport assessment is required which will involve the use of nationally used assessment tools and include the impact on links and junctions.

A green link bridge connecting the north and south towpaths is not identified in any plans from TfL, and officers are not aware of any available capital funding; developer contributions from site development is not considered likely to be justified through the number of additional pedestrian and cycle trips. Therefore it would not be appropriate to reference a requirement for a new green bridge in this location in the Place-based strategy for the area, given that at this point in time it is not feasible or likely to come forward in the near future.

Please refer to the Council's response to MM2 regarding omission sites.

The Royal Parks (Rep No. 289) has commented that there should be greater recognition of the nature conservation designations of Richmond Park and protection of the parks from recreational pressure, traffic and light spill. Please see the Council's response above to MM 4 question 4.3.

Network Rail (Southern) has made a representation (Rep No. 290) supports the strategy but should reference securing developer and third-party contributions for improving access to and around the station. Please see the Council's response above to MM 6 question 6.3.

The Environment Agency's representation (Rep No. 291) welcomes that the 'policy' section for the place-based strategy emphasises the need to improve the riverside environment.

#### Site Allocations: What is expected to be delivered?

Site Allocations located in this area are shown on the map above and considered below.

A number of comments were received during the Local Plan (Publication) Regulation 19 consultation on the following site allocations. For ease, where modifications are agreed, these have been included within the schedule of modification table located at the end of this statement.

- Site Allocation 35 – Stag Brewery

Planning applications refs. 22/0900/OUT and 22/0902/FUL are currently subject to a Public Inquiry. The Stag Brewery inquiry is due to take place this year. Appeal B (concerning planning ref. 22/0902/FUL) relates to the proposed secondary school.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Historic England's comments.

TfL's comment (Rep No 293) supports the requirement for bus standing space within the site, but is not supportive of the closure of Avondale Road Bus Station. The Council's position is that there is flexibility for a design-led transport solution informed by liaison with TfL at full planning stage. TfL's commented on the current applications subject to Inquiry to advise that further detailed design details could be agreed via further discussion, to be secured by either condition of S106 agreement.

Network Rail (Southern) has commented (Rep No. 296) raising the challenge of the level crossing and need to mitigate safety issues, and suggests supports the strategy should reference securing developer and third-party contributions for improving access to and around the station. Please see the Council's response above to MM 6 question 6.3. Matters relating to the level crossing would be dealt with at full planning application stage, as was the

case regarding the recent assessment of application refs. 22/0900/OUT and 22/0902/FUL, for which officers recommended planning obligations to secure the necessary improvements.

The Environment Agency have commented (Rep No. 298) that the site has been identified as a key opportunity for WFD improvement by way of managed realignment of the flood defence. Any development would need to take into account the site's proximity to the River Thames and high risk of flooding, as the site constraints for flood risk are identified in the Site Allocation.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

With regards to comments received (Rep Nos. 297 and 299), on the need for a secondary school at this site, please refer to the Council's response to MM 20.

- Site Allocation 36 – Mortlake & Barnes Delivery Office

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 37 – Telephone Exchange and 172-176 Upper Richmond Road West

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

- Site Allocation 38 – Barnes Hospital

In May 2023, the Council's Planning Committee resolved to approve the planning application for a new Special Education Needs (SEN) school, the need for which is identified in the SPPS (SD-102), (to be known as London River Academy) and a health centre (planning ref. 22/3758/FUL) and in October 2023 the Decision Notice was issued. Early works commenced on-site in spring 2024 and the school is due to open in autumn 2025.

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies with regards Thames Water's representation.

***Question 11.4 Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?***

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Mortlake & East Sheen and Site Allocations policies (Chapter 13) are considered to be clearly defined and unambiguous so that it is evident how a decision-maker should react to development proposals.

Table of Modifications – Place Based Strategy – Mortlake and East Sheen

Details taken from the Schedule of Proposed Modifications suggested by the Council (May 2024) (LBR-002).

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
				<b>Site Allocation 35 Stag Brewery, Mortlake</b>
SA35.1	n/a	168	Site Allocation 35 Stag Brewery, Lower Richmond Road, 2 <sup>nd</sup> para. 'Description of Current Site Character' in 'Context' box	Typo correction: Access is <del>bea</del> via Lower Richmond Road, Williams Lane and Ship Lane.
SA35.2	n/a	168	Site Allocation 35 Stag Brewery, Lower Richmond Road, 3 <sup>rd</sup> bullet point of 'Relevant Planning History' in 'Context' box	Update the planning history: <ul style="list-style-type: none"> <li><del>'There are currently 2 live planning applications under consideration for outline and full permission for a phased redevelopment of the site for demolition, extension and new buildings (3-9 storeys) for a mixed-used scheme comprising residential, flexible-use space (retail, offices), cinema, hotel/pub and secondary school and sixth form.'</del> <u>Planning Committee resolved to grant full and outline planning permission on 18/07/2023 (application refs. 22/0900/OUT &amp; 22/0902/FUL) for a phased redevelopment of the site for demolition, extension and new buildings (3-9 storeys) for a mixed-use scheme comprising residential flexible-use space (retail, offices café/restaurant, drinking establishment, non-residential institutions and community use and boathouse), hotel/pub, cinema and secondary school and sixth form. Appeal Lodged on 28/02/2024.</u></li> </ul>
SA35.3	n/a	169	Site Allocation 35 Stag Brewery, Lower Richmond Road, 4 <sup>th</sup> bullet point of 'Vision'	Update the text, as there is no formal 'Area of Mixed Use' designation being taken forward in the Plan:



				<p>Whilst this site is not located within a town centre, it falls within the Mortlake Area of Mixed Use. It is therefore expected that this site will provide a substantial mix of employment uses, including lower-cost units suitable for small businesses, creative industries and scientific and technical businesses including green technology. Other employment generating uses will also be supported.</p>
				<p><b>Site Allocation 37 Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen</b></p>
FP.16	n/a	174	<p>Site Allocation 37 Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen</p>	<p>To update terminology in Plan. In context box, fourth column, amend as follows: East Sheen <b>main town</b> centre boundary</p>

**LONDON BOROUGH OF RICHMOND UPON THAMES**  
**LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC**  
**WRITTEN STATEMENT**

**Main Matter 12 – Place Based Strategies and Site Allocations**

**Barnes**

**TUESDAY 2 JULY 2024**

**COUNCIL RESPONSES TO MAIN MATTER 12**

Document version: 06/06/2024

***Question 12.1 Is the area strategy for Barnes justified by appropriate available evidence, having regard to national guidance and local context; and are they in ‘general conformity’ with the LP?***

The Area Strategies in the Local Plan have been developed using a consistent approach having regard to national guidance, the London Plan and the local context. Rather than repeating this across each of the Main Matters 4-12, for the sake of brevity the Council’s response is set out once, in an overarching document for Main Matters 4-12: Place-based strategies. Each of the Main Matter Statements in relation to each individual area strategy and site allocation policies will therefore only cover matters of relevance to that place.

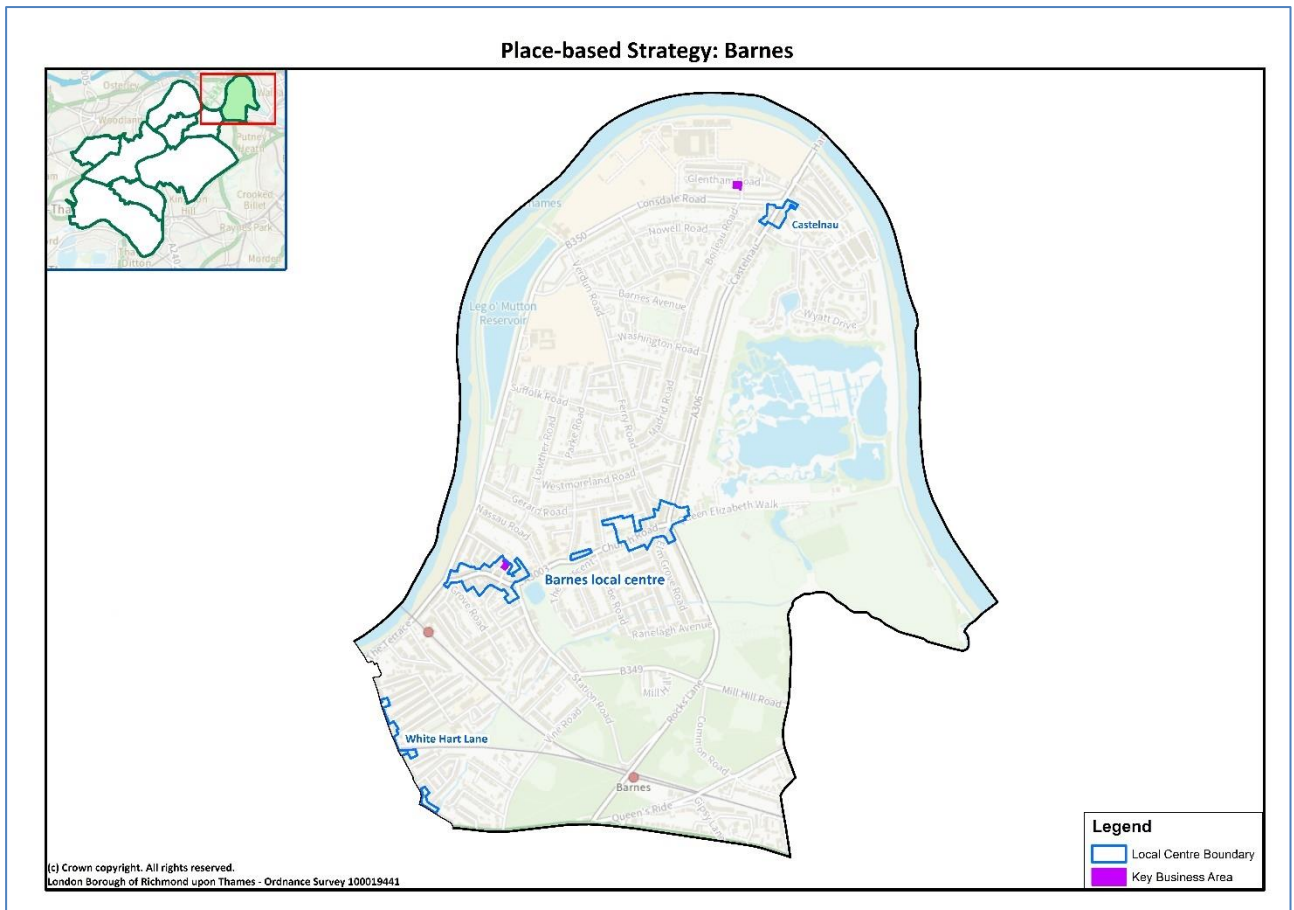
Please refer to the Council’s response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Barnes (Chapter 14) are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

***Question 12.2 Do the housing site allocations show how they will contribute to the achievement of the RLP’s overall housing requirement over the plan period and the timescale for delivery?***

Please refer to the overarching document on the Place-Based Strategies containing the Council’s overall response to housing delivery and the site allocations. There are no Site Allocations within this place-based strategy.

***Question 12.3 Is it clear how the expectations for employment, commercial, retail, social and community infrastructure will contribute to an evidenced need?***

Please refer to the overarching document on the Place-Based Strategies containing the Council’s response to this question.



Barnes (High Street & Church Road) is classified as a local centre in the borough centre hierarchy (as set out in Policy 17) and is in fact the largest of the centres in this tier. Castelnau and White Hart Lane (Barnes/Mortlake) are classified as neighbourhood centres. Whilst none of these centres are large enough to be included in the Mayor's Town Centre Network (Annex 1 of the London Plan) they are important and valued centres in meeting the needs of residents and visitors.

More information and analysis, including review of the borough's centre hierarchy can be found in the Assessment of Borough Centres (SD-065). It is noted that in Table 2a of the Summary document to SD-065, Castelnau neighbourhood centre is identified as clearly serving residents which are relatively disadvantaged, where there is poor public transport accessibility and is serving communities living in an identified gap in provision (see Section 3.1 of Volume 3 of SD-065, in particular map on page 11), and that Barnes also contributes to serving a gap in provision, partly serves an area to the north which is relatively disadvantaged and part of area it serves has low public transport accessibility (see Section 2.1 of Volume 2 of SD-065).

The map above also shows the location of two Key Business Areas (KBA) at Prospect Studios, Barnes High Street and 42-46 Glenthams Road, Barnes.

Barnes hosts a range of social and community infrastructure uses including Barnes Common, Castelnau Community Centre, Castelnau Library, Barn Elms Sports Centre, and Rocks Lane Multi Sports Centre. The WWT London Wetland Centre, an SSSI, is also located within the area. There are several educational uses within the area including Barnes Primary School, St Paul's Juniors, and The Harrodian School (private day school).

#### Representations

Network Rail (Southern) has commented (Rep No. 304) expressing support for the place-based strategy and the policy initiatives around the station.

The Environment Agency's representation (Rep No. 305) welcomes that the place-based strategy has been updated to ensure any works to the terrace are in accordance with other flood risk and biodiversity policies.

#### ***Question 12.4 Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?***

Please refer to the Council's response to question 4-12.1 in the Overarching Statement for the place-based strategies. The Place-Based Strategy for Barnes policies (Chapter 14) are considered to be clearly defined and unambiguous so that it is evident how a decision-maker should react to development proposals.



Table of Modifications – Place Based Strategy – Barnes

No modifications are suggested in the Schedule of Proposed Modifications suggested by the Council (May 2024) (LBR-002) for this place-based strategy.

